

# **Environmental Impact Report** **for the Long Point Resort Project** **RESPONSE TO COMMENTS**



*Prepared for:*  
**City of Rancho Palos Verdes**

*Prepared by:*  
**RBF Consulting**



## 14.0 RESPONSE TO COMMENTS

### A. INTRODUCTION

In accordance with Section 15088, 15089 and 15132 of the California Environmental Quality Act (CEQA), the City of Rancho Palos Verdes has prepared the Program Environmental Impact Report (EIR) for the Long Point Resort Project.

This Comments and Response section combined with the Draft EIR, which was circulated from February 6, 2001 to April 6, 2001, make up the Final Program EIR. Any additional City recommendations or requirements during the certification process will make up the final components of this EIR.

The following is an excerpt from the CEQA Guidelines, Section 15132:

“The Final EIR shall consist of:

- (a) The Draft EIR or a version of the draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.”

This Comments and Responses section includes all of the above required components and shall be attached to the revised Draft EIR to make up the Final EIR. Each comment letter is followed by the corresponding responses. A response is provided for each comment raising significant environmental issues, as received by the City during the Draft EIR review period. Added or modified text is shaded (**example**) while deleted text is struck out (~~example~~).



## B. LIST OF COMMENTS

### PUBLIC AGENCIES

1. California Native Plant Society, South Coast Chapter
2. California Water Service Company
314. California Water Service Company<sup>1</sup>
3. City of Palos Verdes Estates
4. City of Palos Verdes Estates
5. Coastal Conservation Coalition
6. County of Los Angeles, Department of Health Services, Environmental Health
7. County of Los Angeles Fire Department
8. County of Los Angeles Fire Department
316. County of Los Angeles Fire Department<sup>2</sup>
9. County Sanitation Districts of L.A. County
10. County Sanitation Districts of L.A. County
11. Destination Development Corporation
12. Diamondback Ten and Under Girls Softball League
13. Endangered Habitats League
14. League of Women Voters of Palos Verdes Peninsula
15. Palos Verdes Girls Softball League
16. Palos Verdes Girls Softball League
17. Sierra Club Palos Verdes Bay Group
18. Sierra Club Palos Verdes Bay Group
315. South Coast Air Quality Management District<sup>3</sup>
19. Southern California Association of Governments
20. State of California, California State Lands Commission
21. State of California, Governor's Office of Planning and Research, State Clearinghouse
22. U.S. Department of the Interior, National Park Service
313. U.S. Department of the Interior, National Park Service<sup>4</sup>
23. U.S. Department of Transportation, U.S. Coast Guard
24. U.S. Fish and Wildlife Service, Carlsbad Fish and Wildlife Office/California Department of Fish & Game

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<sup>1</sup> It should be noted that this comment letter was received after the close of the public review period.

<sup>2</sup> Ibid.,

<sup>3</sup> Ibid.,

<sup>4</sup> Ibid.,



- 25. U.S. Fish and Wildlife Service, Carlsbad Fish and Wildlife Office/California Department of Fish & Game
- 26. Union Local 30, Hotel Employees and Restaurant Employees Union of San Diego

## **RESIDENTS**

- 27. Absmeier, Glenous
- 28. Aelit-Louis, Maggie
- 29. Aiken, Barry, Bill and Kay
- 30. Alley, Thomas L.
- 31. Allman, Mr. And Mrs. Ralph B.
- 32. Alpert, Dorothea
- 33. Amico, Charles W.
- 34. Anderson, Alicia
- 35. Anderson, Brittany
- 36. Anderson, Todd P.
- 37. Anderson, Todd P.
- 38. Andreotti, Cindy and Tupper, John
- 39. Arbuthnot, Glenn
- 40. Balog, Edith
- 41. Barbeito, Bernard
- 42. Intentionally Omitted
- 43. Bescoby, Ruth
- 44. Bescoby, Ruth
- 45. Blackwelder, Dr. and Mrs. Ron and Mr. & Mrs. Kermit Olson
- 46. Bloss, Walter and Meredith
- 47. Brajevich, Mr. and Mrs.
- 48. Brunone, David
- 49. Brunone, David and Marshan
- 50. Cain, Holly
- 51. Cain, Holly
- 52. CANanC
- 53. Carbonal Family
- 54. Carmichael, John
- 55. Carter-Siewertsen, R.H.  
Cellier, Alfred - Refer to No. 147.
- 56. Chaisson, Bernard
- 57. Chaisson, Bernard
- 58. Chaisson, Cindy
- 59. Clarke, D.E.
- 60. Clarkson, Herb and Dodie
- 61. Clarkson, Herb and Dodie



62. Cole, Mr. And Mrs. Robert L.
63. Cooper Family
64. Covey, Barbara
65. Covey, Barbara
66. Crosby, Jeanne A.
67. Deason, Keelin Marie
68. Detwiler, Mark
69. Detwiler, Mark and Suzanne
70. Driskell, Rowland
71. Driskell, Rowland
72. Driskell, Rowland
73. Driskell, Rowland
74. Driskell, Rowland
75. Driskell, Rowland
76. Driskell, Rowland
77. Driskell, Rowland
78. Driskell, Rowland
79. Driskell, Rowland
80. Driskell, Rowland
81. Driskell, Rowland
82. Driskell, Rowland
83. Driskell, Rowland
84. Driskell, Rowland
85. Driskell, Rowland
86. Duncan, Jeff
87. Eads, Brentt and Erin
88. Edridge, Alfred J. and Deanne L.
89. Emon, Akhtar H.
90. Epstein, Jack and Barbara
91. Felando, William and Mary Ann
92. Fenton, Harold and Florence
93. Foster, Bill and Marty
94. Intentionally Omitted
95. French, Dr. and Mrs. James
96. Friedson, Dena
97. Friedson, Dena
98. Friedson, Dena
99. Friedson, Dena
100. Friedson, Dena and Shaw, Ann (SOC II)
101. Fung, C.H. (D.D.S.)
102. Gleghorn, Barbara
103. Gleghorn, Barbara
104. Gleghorn, Barbara
105. Gleghorn, Barbara and Friedson, Dena SOCII



106. Gleghorn, George J - Save Our Coastline II
107. Gleghorn, George J. SOC II Steering Committee
108. Gottschalk, Diana
109. Green, Jerry and Zelda
110. Green, Jerry and Zelda
111. Gruen, Daniel and Margaret
112. Guerra, Maria C. (M.D.
113. Gussman, Bill and Gwen
114. Gussman, Bill and Gwen
115. Haase Jr., Robert C.
116. Hagerthy, Mike and Marilee
117. Harris, Gretchen
118. Hathaway, Jim, Sachie, Erika, Alisa
119. Heller, Bridget
120. Heller, Bridget
121. Herman, Judith
122. Hewitt, Patricia
123. Hollenbeck, Jot & Linda
124. Hong, Ed
125. Hummel, Edward & Joann
126. Hunter, William & Marianne
127. Hunter, William & Marianne
128. Jacobs, Leslie G.
129. Jamison, Bernadette
130. Jones, Cassie
131. Kapp, Joe and Mary Ann
132. Kenny, Frank and Lea
133. King, Howard
134. Knight, Jim
135. Knight, Jim
136. Knight, Jim
137. Knowles, Alex
138. Kohgadai, Mahbooba
139. Kolderup, Nils
140. Konopasek, Ken and Mary
141. Koplik, Doris
142. Koplik, Jane M.
143. Kukel, Joseph
144. Kwan, Benjamin
145. Lee, Kristina
146. Lindenmuth, Marlys
147. Cellier, Alfred
148. Lukstein, Angela
149. Lukstein, Janis and Edward



150. Marinkovich, Leah
151. Marinkovich, Mr. And Mrs. Ronald
152. Marl, Betty
153. Marl, Betty
154. McCarthy, Jim and Connie
155. McCreight, Louis R.
156. McDannold, Stephen and Linda
157. McJones, Madeleine
158. McJones, RW
159. Meng, Dick
160. Michetti, Bruno
161. Michetti, Bruno
162. Morgan, Kathleen
163. Nay, Dorrine
164. Newton, Karyl
165. Nunn, John
166. Omar, Osair and Barbora
167. Oneb, Charlie and Mary
168. Ott, Patricia
169. Papadakis, Angie
170. Patton, Bill and Sandy
171. Payne, Mr & Mrs Mark O.
172. Payne, Paul
173. Payne, Paul
174. Payne, Paul
175. Payne, Paul
176. Pehrson,
177. Peterson, Norman W.
178. Pfeil, Mark
179. Picarelli, Joseph, St. Paul's Lutheran Church
180. Pinkham, Dan and Vicki
181. Pisano, George A.
182. Porter, Jan
183. Powell, Marty & Charles
184. Pride Jr., Andrew
185. Pride, Angela
186. Quirarte, Vic
187. Quirarte, Vic
188. Quirarte, Vic
189. Quirarte, Vic
190. Randall, Jim
191. Rankin, Steve
192. Raue, Jorg and Anke
193. Rennick, Sydelle

194. Reuben, Paula
195. Ross, Mary
196. Rothstein, Ronald M.D.
197. Russell, Howard and Marilyn
198. Satalich, Jack & Nina
199. Sattler, Alfred
200. Sattler, Barbara
201. Sattler, Barbara
202. Saunders, Ken and Seta
203. Saunders, Monica
204. Saunders, Stephanie
205. Schenasi, Laura Allman
206. Schoenfeld, John A. and Victoria V.
207. Schoenheider, Mary Jane
208. Shaw, Ann
209. Shaw, Ann
210. Shurm, Jerry
211. Spitz, Maria
212. Stahl, Gary and Pam
213. Stansfield, Arlene & Jim
214. Stefanides, Mr. And Mrs. Neil
215. Stegura, Debbie
216. Steiger, Glen L.
217. Steiger, Glen L.
218. Steiger, Glen L.
219. Steiger, Glen L.
220. Steiger, Glen L.
221. Steiger, Glen L.
222. Steiger, Glen L.
223. Stenchjem, Patricia
224. Stern, Douglas
225. Stevens, Brent and Annette
226. Stevenson, Ivan K.
227. Stevenson, Ivan K.
228. Tolliffe, William
229. Tom, Mike
230. Trainor, Shelly J.
231. U8 Angels Girls Softball Team
232. Uhe, Jennifer
233. Vien, Leslie W.
234. Vitro, Anita
235. Von Nordenflycht, Arvid and Sue
236. Wachli, John and Marlis
237. Wall, Thomas E.

- 238. Wannamaker, Clayton G.
- 239. Watters, Janet L.B.
- 240. Wersching, Jacob
- 241. Wessel, John
- 242. Wildman, Scott
- 243. Willard, Gregg and Jeanne
- 244. Woodcock, J.M.
- 245. Wright, Otis D. II
- 246. Wuerker, Scotty
- 247. Wuerker, Scotty     SOCII Steering Committee
- 248. Yamada, Akemichi
- 249. Young, Alice S.
- 250. Young, Douglas
- 251. Zachman, Jill
- 252. Zambello, Erica
- 253. Zevin, Elizabeth

### **ORAL COMMENTS - MARCH 13, 2001 PUBLIC HEARING**

- 254. Vice Chairman Clark, Planning Commissioner
- 255. Vice Chairman Clark, Planning Commissioner
- 256. Vice Chairman Clark, Planning Commissioner
- 257. Commissioner Vannorsdall
- 258. Commissioner Long
- 259. Mike Mohler, Applicant
- 260. Barbara Gleghorn, Resident, Representing SOC II
- 261. Jim Knight, Resident, Representing SOC II
- 262. George Gleghorn, Resident
- 263. Lois Larue, Resident
- 264. Paul Payne, Resident
- 265. Jim Hathaway, Resident
- 266. Bob Nelson, Resident, Representing Seabluff HOA
- 267. Vic Quirarte, Resident
- 268. Norma Knowles, Resident
- 269. Joseph Picarelli, Resident
- 270. Angie Papadakis, Resident
- 271. Jim Knight, Resident
- 272. Todd Anderson, Resident
- 273. Rowland Driskell, Resident
- 274. Ian MacDonald, Resident
- 275. Bruce McGowan, Resident
- 276. David Tomblin, Resident
- 277. Dena Friedson, Resident, Representing SOC II



- 278. Joan Carbonel, Resident
- 279. Stasys Petravicius, Resident
- 280. William Tolliffe, Resident
- 281. Barbara Sattler, Resident
- 282. Alfred Sattler, Resident
- 283. Lily Van Patten, Resident
- 284. Barry Holchin, Resident, Representing the PV/South Bay Sierra Club
- 285. Jess Morton, Resident, Representing the Coastal Conservation Coalition
- 286. Angelika Brinkmann Busi, Representing the SC CA Native Plant Society
- 287. Holly Cain, Resident
- 288. Robert Haase, Resident
- 289. Ann Shaw, Resident
- 290. Vice Chairman Clark, Planning Commissioner
- 291. Commissioner Mueller
- 292. Commissioner Paulson
- 293. Commissioner Cartwright

### **ORAL COMMENTS - 3/26/01 TRAFFIC COMMITTEE MEETING**

- 294. Rowland Driskell, Resident
- 295. Dena Friedson, Resident
- 296. Tom Redfield, Resident
- 297. Wendy Force, City of Palos Verdes Estates Public Works Department
- 298. William Tolliffe, Resident
- 299. Ann Shaw, Resident
- 300. Action Taken
- 301. Member Covey
- 302. Member Paula Reuben
- 303. Member Hildebrand
- 304. Member Covey
- 305. Member Schurmer
- 306. Member Wall
- 307. Member Covey
- 308. Member Hildebrand
- 309. Member Hildebrand
- 310. Member Hildebrand
- 311. Mike Mohler
- 312. George Gleghorn

## COMMENTS RECEIVED AFTER CLOSE OF PUBLIC REVIEW PERIOD

- 313. U.S. Department of the Interior, National Park Service (refer to Public Agency Responses)
- 314. California Water Service Company (refer to Public Agency Responses)
- 315. South Coast Air Quality Management District (refer to Public Agency Responses)
- 316. County of Los Angeles Fire Department (refer to Public Agency Responses)



Gray Davis  
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research  
State Clearinghouse



Steve Niss  
DIRECTOR

**ACKNOWLEDGEMENT OF RECEIPT**

**RECEIVED**

DATE: February 13, 2001

TO: David Snow  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

FEB 20 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

RE: LongPoint Resort Project (General Plan Amendment #28 Coastal Permit  
#166, Conditional Use Permit #215 & 216, Tentative Parcel Map # 26073 & Grading Permit  
Nos. 2229/2230

SCH#: 2000071076

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: February 6, 2001  
Review End Date: March 22, 2001

We have distributed your document to the following agencies and departments:

California Coastal Commission  
California Highway Patrol  
Caltrans, District 7  
Department of Boating and Waterways  
Department of Conservation  
Department of Fish and Game, Marine Region  
Department of Fish and Game, Region 5  
Department of Parks and Recreation  
Native American Heritage Commission  
Office of Historic Preservation  
Regional Water Quality Control Board, Region 4  
Resources Agency  
State Lands Commission  
State Water Resources Control Board, Division of Water Rights

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.



# **PUBLIC AGENCY COMMENTS**

# California Native Plant Society

COMMENT NO. 1

## SOUTH COAST CHAPTER

April 5, 2001

City of Rancho Palos Verdes  
c/o Mr. David Snow  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

RECEIVED

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: Draft EIR for the Long Point Resort Project

Dear Mr. Snow,

Thank you for giving the South Coast Chapter of The California Native Plant Society the opportunity to comment on the voluminous DEIR for the above named project. Although the document includes lengthy explanations of procedures, backgrounds and definitions and contains many quotations from laws and plans, we found it completely inadequate regarding the compiled information on biological resources and the resulting impact analysis. Consequently, we cannot agree that the project impacts after the proposed mitigation would be less than significant. In fact, we found so many questionable statements, that we hardly know where to start with our comments.

1A

### Alternatives

At the first public hearing before the Planning Commission, we learned that the developer has changed the preferred Alternative to the "Relocate Practice Center Option "B" Alternative". Usually the preferred alternative is the one most thoroughly discussed in a DEIR. Changing the preferred alternative makes it difficult to analyze this DEIR. This is especially difficult since according to p. 7-27 for the new preferred alternative, "...further analysis (with grading plan) would be required to assess the adequacy of the physical separation between the golf elements proposed under this alternative." The discussion concedes that this alternative would have more impact on the biological resources than the original proposal. There would be more habitat fragmentation and the third hole would intrude on mixed sage scrub habitat. However, a more detailed evaluation is only possible with a specific grading plan. The mixed sage scrub area this new alternative would impact shelters (according to Exhibit 5.3-2) specimens of *Dudleya virens*, a special species plant. For these reasons the DEIR does not adequately address the potential direct and indirect environmental impacts of the proposed project. Interestingly, Table 7-1, Comparison of Alternatives contradicts the above quoted statements about impacts in biological resources and lists less impacts on them than the proposed project would have.

1B



*Dedicated to the preservation of California native flora*



According to p. 7-46, the Environmentally Superior Alternative is "No Resort Villas-Option B", because of supposed reductions of significance of impacts on biological resources. Table 7-1 shows less impacts on biological resources and aesthetics/glare from this alternative than from the proposed project, while all the other environmental impacts are equivalent to the proposed project. However, a comparison of the maps shows, that the same areas are used as in the newly preferred alternative. No additional habitat is proposed. So why is the conclusion made that this alternative has less impact on biological resources?

1C

According to Table 7-1, the most environmentally friendly alternative clearly is the Pt. Vicente Park Enhancement Alternative which has much fewer impacts than the currently proposed project alternative. Public Health and Safety impacts are equal, based on the assumption that there may be hazardous materials on site from previous historic use that have to be removed and the potential use for soccer, baseball and/or softball fields. Who made the evaluations for this EIR? Even for the alternative discussions they contradict each other.

1D

The proposed project already includes another, privately owned parcel (CIGNA site) and public open space. The DEIR includes alternatives that require the addition of even more properties, including the Coast Guard site, and a piece of Lower Point Vicente (Relocate Practice Facility-Option "A").

1E

According to earlier statements by the developer, Lower Point Vicente public open space was no longer to be considered due to strong public opposition, especially by docents and supporters of the Pt. Vicente Interpretive Center. To our knowledge, the City did not support the consideration of parts of lower Pt. Vicente into the proposed private development. Since the addressed properties are not available to the developer, how can these be feasible alternatives? These alternatives don't belong in the document, and neither does the alternative using public open space in Upper Point Vicente, which is opposed by a great many residents of the city.

1F

We support the Point Vicente Park Enhancement Alternative that calls for protection of the existing habitat on Upper Point Vicente and restoration of the majority of the property. The facts clearly support it as the Environmentally Superior Alternative! This alternative does not preclude the "No Project" Alternative, the already approved project for the Long Point site. It is interesting that the developer points out the existing eyesore at the blighted old Marineland site. The same developer is responsible for having left it in its current state of disrepair. The developer could have improved the site years ago, including the resort, restaurant, conference center, 50 casitas, tennis courts and the 9 hole golf course and still maintains the permits to do so.

1G

### **Biological Resources**

#### **Taxonomy**

Supposedly, according to p. 5.3-1 the taxonomy used follows Hickman (1993) for

1H



scientific and common names. This is not consistently done in the report. For example *Hemizonia parryi ssp. australis* is listed as "*Centromadia parryi ssp. australis*". Also there are several misspellings. *Aphanisma* is constantly misspelled. Ashy-leaved buckwheat (*Eriogonum cinereum*) is spelled correctly a few times, but on several occasions is erroneously referred to as *Eriogonum cinerascens*. Likewise there are misspellings of names of animals. The report also frequently misspelled the scientific name of the Palos Verdes Blue butterfly (*Glaucopsyche lygdamus palosverdesensis*). Such evidence of sloppiness concerns us.

1H

### Inadequate Data

#### Plant List

According to p. 5.3-1 all "Plant species observed were recorded in field notes". However, this is the first DEIR that we have seen that doesn't even bother to include a list of all observed plants, or animals on the site. It is crucial information. This exclusion is inexcusable and surely not because of any intent to keep the document short.

As a matter of fact, the lack of knowledge regarding the existing plant species on site reveals itself in the absolutely unacceptable Plant Palette (Appendix II of the Long Point Resort Permit Documentation), that the DEIR refers to (p. 5.3-42). Not only does that palette include numerous invasive plant species that could in time significantly alter the habitat areas abutting to the project site, but it proposes 23 plant species for the conservation areas, 11 of which are plants that do not naturally occur on the Palos Verdes Peninsula. Five plants are only named by their genus, which is much too vague, since they have numerous different species that may be completely unsuitable to the area. Worse, one of the named plants, Pride of Madeira (*Echium fastuosum*), is not even native to California, but has proven to have the potential of spreading and naturalizing. This list also proposes the use of *Ceanothus* cultivars in conservation areas. *Ceanothus* species do not naturally occur in the coastal sage scrub of the peninsula, they are chaparral species. The use of cultivars, which are clones of a plant selected for its horticultural value, is counterproductive to ecological restoration efforts. Many of the coastal sage scrub plants that should have been included for restoration plantings in conservation areas were omitted.

1I

Although we have not reviewed any other parts of the Long Point Resort Permit Documentation the proposed Plant Palette is surely an indicator of the quality of the rest of the repeatedly quoted LPHCP.

#### Surveys

According to the document surveys were conducted in August/September. This explains, why one of the special plant species that occurs on the site, the Catalina Mariposa Lily (*Calochortus catalinae*) was not observed.

According to p. 5.3-2, Dudek & Associates conducted focused plant surveys in 1998, supposedly at a time, when most, if not all of the species would be evident. Which time of the year were these surveys done? Why were the Dudek surveys neither attached to the

1J

Initial Study, nor in the Appendix of the DEIR? We would like to know the dates and details of that survey.

1J

#### Butterfly Host Plants

We were a bit confused about the paragraph regarding butterfly host plants. It notes the ashy-leaved buckwheat (*Eriogonum cinereum*) as host plant for the El Segundo Blue butterfly (*Euphilotes battoides allyni*). A related butterfly, a square spotted blue subspecies endemic on the Palos Verdes Peninsula, lives on the ashy-leaved buckwheat. However, the original El Segundo blue, which is described with its characteristic dune habitat, feeds on the seacliff buckwheat, *Eriogonum parvifolium*. Which butterfly is the report addressing here? Incidentally, *Eriogonum parvifolium* has been found in the past on the bluffs of the Marineland site. Without the plant list we could not check if the project consultants found the plant there recently.

1K

#### Special Status Biological Resources

The DEIR includes a list of special status plant species that potentially could occur within the project region. Interestingly, the list includes several species that are not usually addressed in local EIR's. However, other special status plants, that are known to occur on the Palos Verdes Peninsula were omitted. These include: *Calandrinia maritima* (CNPS List 4), *Calystegia peirsonii* (CNPS List 4), and *Dichondra occidentalis* (CNPS List 4). These species need to be properly addressed in the DEIR. *Calochortus catalinea* was not observed, as noted earlier, but in fact is known to occur on the Upper Pt. Vicente park.

1L

Focused surveys should have been done already (what about the quoted Dudek focused surveys? Where are their results?) and need to be part of the DEIR. How else is a thorough evaluation of the impacts possible without the knowledge of how many of the special status plants will be impacted? Instead this DEIR defers specifics to a later point. This is not in concurrence with CEQA.

1M

#### Inadequate Impact Analysis

##### Wildlife Corridor

On p. 5.3-11 the report defines wildlife corridor as "... a piece of habitat, usually linear in nature, that connects two or more habitat patches that would otherwise be fragmented or isolated from each other." Following, it is explained that the "...native habitats (e.g. coastal sage scrub) of the project site remain connected to larger areas of natural habitats primarily to the east. One canyon remains immediately north of the UPVA portion of the Project site that supports coastal sage scrub habitats." (p. 5.3-11) Still, the document concludes that the project site does not contain wildlife corridors or wildlife crossings. This is a contradiction that doesn't make any sense. In fact, the existing habitat on the Upper Pt. Vicente site is, in our opinion, extremely important for habitat connection. The impact evaluation regarding wildlife movement on p. 5.3-62 considers a potential interference of project implementation with the movement of wildlife species. We agree

1N

with that statement, but disagree with the report's evaluation that impacts would be less than significant.

1N

On p. 5.3-39 the documents states: "The steep cliffs of the RHA are also expected to provide a narrow linkage for wildlife east and west of the site." We have always emphasized the importance of the bluff vegetation and the necessity for their protection. However, Exhibit 5.3-3 only shows habitat preservation on the west part of the bluffs. Where is the connection to the east as described in the statement above?

1O

#### Special Status Biological Resources

The impacts to special status species are not known yet, or at least they are not part of the EIR as they should be. Despite this, the evaluation is made that after mitigation there will be no significant impacts. Based on what?

The basic two proposed mitigation measures are:

- o a pre-construction survey, and
- o develop a mitigation plan. How will these two measures by themselves mitigate impacts in special species populations? It is the implementation of protective measures that could mitigate impacts, preferably the measure of impact avoidance of all special status species.

1P

The information regarding the California gnatcatcher, a federally listed species, could not be more vague. According to p. 5.3-49 the species may be impacted and these impacts are considered to be significant. "The Long Point Habitat and Conservation Plan (LPHCP) has been developed and would be implemented to reduce these impacts to a level of less than significant." How should we be able to evaluate this suggested mitigation? The LPHCP is not part of this DEIR. The Plant Palette by itself alarms us. Again, this is deferred mitigation which is not in accordance with CEQA.

1Q

Dr. Jon Atwood, the expert on California gnatcatchers, considers the Upper Point Vicente property as key element for the dispersal of the California gnatcatcher. The Resources Agencies have also voiced their opinions about the importance of the habitat of Upper Point Vicente. Why is of this not mentioned in this DEIR?

#### Habitat

According to the DEIR the impact on native scrub is considered insignificant. However, the proposed project will further fragment existing habitat. Except for Exhibit 5.3-4, which also shows graded new habitat, we have no detailed grading map. Especially since the preferred alternative has been changed, how can we evaluate the impact of grading? This information should be contained in the DEIR. In addition, Exhibit 5.11-2 shows the proposed Upper Point Vicente Area Infrastructure Plan. New water lines, sewer lines and storm drains are proposed that cut through existing habitat. Their installation will surely directly and indirectly impact these habitat areas, yet these impacts are not even mentioned in the DEIR.

1R

### Edge Effects

At one point (p. 5.3-59) edge effects are briefly addressed: "When development is configured in a manner that creates a high ratio of development edge to natural open space, there is an increase in the potential impacts caused by human use (indirect impacts)." We agree with this statement. A look at Exhibit 5.3-4 shows, that the existing habitat is going to be further fragmented by the proposed project and that even after restoration the ratio of edge to habitat is very high. Why should such a fragmented mix of golf course, and the diminished remnants of habitat be expected to be a better environment for the existing animals than the existing scrub vegetation and abutting grassland, which currently functions as documented habitat? It just doesn't make any sense from an ecological point of view, especially since some of the narrow strips of remaining habitat may be so compromised by edge effects, that their habitat value could be lost. Taking such a risk seems particularly unjustified on the publicly owned land of Upper Point Vicente.

1S

### Indirect Impacts

The report doesn't even consider the limitation of construction noise during the breeding period from mid-February to mid-August. A 100 foot buffer area to mitigate construction noise cannot be effective and is not sufficient.

1T

Regarding night lighting, mostly the impact on nesting and roosting along cliffs and rocky sea shore is addressed. But night lighting of the proposed driving range is likely to also impact adjacent occupied gnatcatcher and cactus wren habitat? These impacts need to be addressed and mitigation measures need to be proposed. If the applicant is going to change the preferred alternative again the impacts of each alternative must be thoroughly addressed in this DEIR.

1U

### Fencing of Natural Habitat

To mitigate potential impacts by golfers, fencing is addressed on p. 5.3-61. However, the fencing issue of native habitat was not mentioned under potential aesthetic impacts. Fences could not only impact the views but could also impact wildlife movement and need to be addressed in the document. Whether fencing will be sufficient to deter intrusion into habitat areas also needs to be evaluated.

1V

### Mitigation Measures

#### Special Status Biological Resources

The mitigation measures for special status biological resources need to include the replacement ratio for impacted plants and plant communities.

Regarding *Dudleya virens* it is suggested as a mitigation measure to collect the corms and seeds of impacted plants. Seeds are proposed to be broadcasted at a prepared mitigation site and a minimum of 60 % germination is expected as performance criteria. Would it not be easier if plants are grown from seeds in a controlled environment and then planted out into the restoration areas? How will that 60 % germination success be

1W



evaluated? In the end, the germination success is much less important than the number of plants that will be able to reach maturity.

1W

If other special status plants are found in a pre-construction survey, "...mitigation measures shall be developed in consultation with the appropriate resource agencies.." (5.3-1b, p. 5.3-65). The public must be allowed to comment on these proposed mitigation measures before permits are granted.

1X

Regarding box-thorn and sea blite it is suggested that "...these plants would be included in the seed mixes for revegetation of coastal bluff..." (p. 5.3-47). First of all, the bluffs should not be revegetated, but ecologically restored. Revegetation just means re-planting and does not necessarily entail site specific local native plants. Second, seeding of the steep bluffs would be quite difficult and results are likely to be questionable. Third, but not least, all seeds need to be collected only from local native plant populations and should not be allowed to come from outside sources.

1Y

#### Sensitive Natural Communities

The document implies that mitigation measures, especially the so-called "revegetation" will not only lessen the impacts to an insignificant level, but even improve and increase the habitat areas.

According to p. 5.3-42, the LPHCP "...would include 16.80 acres of restored and newly created habitat within Recreation Areas of the UPVA as mitigation for impacts to 4.91 acres of coastal sage scrub habitat in the UPVA and 0.10 acre of coastal bluff scrub in the RHA." Restoration areas should be overlapped by a conservation easement. There are no long term guarantees for restored and newly created habitat areas within areas with a recreational overlay. The majority of what is being claimed as newly created coastal sage scrub would be landscaping for the golf course rather than habitat areas. The new "habitat" areas would either be fragmented by the golf course or delineate its boundaries. Much of the newly created habitat will be in graded areas, where it will be harder to successfully establish native plants, than in areas where the top soil is left undisturbed. There is no guarantee that the newly created habitat will be able to fulfill the needed functions. How can this be sufficient mitigation?

1Z

The calculation that 16.80 acres represent a replacement ratio of 3.4 to 1 is more than questionable. It does not consider, that there also should be mitigation for the increasing habitat fragmentation and for the time period necessary to establish habitat. Only time will tell if the habitat quality would be comparable.

Based on the above analysis, the declaration that with the additional 22.94 acres preserved coastal sage scrub, coastal bluff scrub and rocky shore/bluff the compensation ratio is over 7 to 1 is completely absurd. Avoidance of sensitive resources is the preferred mitigation and can not be double counted for habitat removal.

The discussed ratio relates to the mitigation of only 5 acres of impacted scrub. However, a total of 90 acres native and non-native vegetation types would be impacted "...that provide valuable nesting, foraging, roosting, and denning opportunities for a wide variety

of wildlife species" (p. 5.3-58 DEIR).

1Z

According to mitigation measure 5.3-2a, "the LPHCP shall be implemented ... to the satisfaction of the City. The Program shall contain habitat restoration and enhancement design details for the Conservation Planning Areas through revegetation with drought-tolerant species, transitional areas of planting..., and design for long term sustainability." (p.5.3-67). We have already pointed out how unacceptable and unscientific the proposed Plant Palette is for conservation areas. A HCP first needs to be approved, not only to the satisfaction of the City, but by the Resource Agencies and with public input.

1AA

Revegetation with drought tolerant species is not sufficient for restoration purposes. Revegetation of habitat or restoration has to be done with suitable local native plant species, propagated from local plant stock.

In addition, a mitigation measure should be included that prohibits the use of invasive non-native plant species in the landscaping.

#### **Mitigation Monitoring Program**

Measure 5.3-2h, Monitoring Plan, asks that with successful restoration coverage prior to five years the Applicant may request to be released from monitoring requirements. However, restoration monitoring and evaluation should be done for a minimum of five years, preferably longer.

1BB

Paragraph 13.0 quotes a mitigation monitoring table listing the measures that may be included as conditions of approval. However, in our copy this table is missing. The text doesn't detail the monitoring program. Since it is specifically quoted that guidelines for implementing mitigation monitoring requirements shall be defined prior to final certification of the EIR, according to Section 21081.6 of the Public Resources Code, where is that information for public input?

In addition this paragraph ends with "The developer will have the responsibility for implementing the measures, and the various City of Rancho Palos Verdes departments will have the primary responsibility for monitoring and reporting the implementation of the mitigation measures." (p. 13-1). To monitor restoration or species protection measures a qualified biologist will be needed. The City does not have a biologist on staff. Additional experts may be needed for other fields. In our recollection of previous developments, it was the developer who would hire an independent biologist for monitoring. The City needs to insist that the Long Point developers will also fulfill the monitoring requirements. The City, however, still needs to supervise and check the monitoring.

1CC

#### **Natural Community Conservation Plan**

According to paragraph 5.3-4, there are no impacts to any local policies or plans protecting biological resources. This is based on the statement, that there is currently no adopted HCP, NCCP, or other local plan. While no plan is yet adopted, the developer is well aware of the local NCCP planning process. One alternative of the NCCP includes

1DD

Upper Point Vicente within the preserve system. In fact, in the latter paragraph the DEIR states: "The proposed Project is consistent with the preferred preserve design and the Project Applicant is participating landowner in the NCCP program." (P. 5.3-63). But what preferred alternative is addressed here? The proposed project may be consistent with the developers preferred preserve design, but the city has not yet identified its preferred preserve design alternative. The project is clearly not consistent with the ecologically preferred preserve design. This project proposal clearly is trying to influence the NCCP outcome, which is unacceptable.

1DD

On the other hand, the DEIR plays it both ways and uses the proposed NCCP in addition to the vague proposed mitigation measures for implementation of this project to evaluate the cumulative impacts as less than significant.

### Hydrology and Drainage

There were obviously 2 Conceptual Drainage System Schematics planned to be included, for Discharge Point 1 and 2. While the pages are reserved for these Exhibits they are missing in our copy of the DEIR.

1EE

To sum up, we strongly feel that this DEIR is inadequate and interferes with the NCCP process. In addition, a General Plan amendment would be needed to change the passive recreational use for Upper Point Vicente to active recreational use. The community has clearly and repeatedly voiced that it would like to see the enhancement of the public Upper Point Vicente site for habitat and mostly passive recreational use. That Upper Point Vicente Park Enhancement proposal is included in this DEIR as an alternative and is clearly the environmental superior alternative, even though it is not acknowledged as such by this DEIR.

1FF

Therefore we urge you to maintain the Upper Point Vicente site for passive recreational and habitat use and deny the project's applications for a General Plan Amendment, Conditional Use permit and the grading permit on UPVA.

We could not help but wonder, if the excessive amount of paper in this document is not supposed to provide a smoke screen and filler to distract from the real and often inadequate information given within in this document. Perhaps the title "Preliminary Draft EIR" was not a mistake after all.

Sincerely,



Angelika Brinkmann-Busi  
Conservation Chair, South Coast Chapter  
2141 West 35th Street, San Pedro, CA 90732  
(310) 519-8164



**CALIFORNIA WATER SERVICE COMPANY**

5837 CREST ROAD WEST

RANCHO PALOS VERDES, CA 90275-5701 • (310) 377-5525 • F (310) 377-5700

**COMMENT NO. 2**  
PALOS VERDES DIST.

**RECEIVED**

APR 05 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

*cc for cc  
Randy Snow*

April 5, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

RE: The Long Point Resort:

Dear Mayor, Members of the City Council and Planning Commissioner:

As a member of the Palos Verdes Peninsula Business community and the Chairman Elect for the Palos Verdes Chamber of Commerce, I understand the importance in developing the Long Point property. To allow it to remain undeveloped would be a missed opportunity for our community. The plan to establish another top-notch resort like the Ocean Trails Golf Club would only help to make the Palos Verdes Peninsula a more attractive destination location.

The added revenue to local businesses and the city should also be a consideration when making this decision.

California Water Service has supported communities that they serve since 1926. We look forward to a co-operative community effort to enhance the once beautiful Long Point area.

Sincerely,

Donald B. Jensen  
District Manager

2A

**CALIFORNIA WATER SERVICE COMPANY**

5837 CREST ROAD WEST  
RANCHO PALOS VERDES, CA 90275-5701 • (310) 377-5525 • F (310) 544-4963

PALOS VERDES DISTRICT

**COMMENT NO. 314**

April 13, 2001

Mr. David Snow  
Deputy Director  
City Rancho Palos Verdes  
30940 Hawthorne Blvd  
Rancho Palos Verdes, Ca. 90275

**RECEIVED****'APR 16 2001**PLANNING, BUILDING,  
& CODE ENFORCEMENT

Subject: Long Point Project E.I.R.

Furnishing water service to the subject property will not have a significant affect upon our present or future supply. Primary service would be provided from our existing 12-inch main on the south side of Palos Verdes Drive South or utilizing existing 12-inch main which parallels through the existing property or the installation of new facilities, which would be in accordance with the California Public Utilities Commission main extension rules.

**314A**

The subject property and other proposed development in the coastal area to the north and east are within a pressure zone needing additional pumped storage for more reliable and efficient operation of that portion of our system. The amount of storage needed to improve the existing system and satisfy anticipated future development within the zone would be three to five million gallons. The storage facility would be constructed at California Water Service expense.

A site of one to two acres would be needed to accommodate pumping facilities and a steel tank approximately 30 to 35 feet high and 130 to 150 feet in diameter. The tank would be surrounded by an earth berm and landscaped to minimize visual impact.

**314B**

As more customers come on line with this zone our pumping cost will become very excessive under current operating conditions. Also, as the number of customers increases it is desirable to have storage facilities closer to the point of use.

Hopefully you can resubmit this in your E.I.R. report. If additional information is needed or as more specific plan develop, please do not hesitate to contact us. The contact person should be:

Mr. Donald B. Jensen  
5837 Crest Road West  
Rancho Palos Verdes, Ca. 90275  
Phone (310) 541-2438

Sincerely,

CALIFORNIA WATER SERVICE COMPANY

Peter Akhotnikoff  
General Superintendent





CITY OF  
*Palos Verdes Estates*

COMMENT NO. 3

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MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 21, 2001

Mr. David Snow, AICP  
City of Rancho Palos Verdes  
Department of Planning, Building and Code Enforcement  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

RE: LONG POINT RESORT INITIAL STUDY ENVIRONMENTAL IMPACT  
REPORT

Dear Mr. Snow:

The City of Palos Verdes Estates has reviewed the Environmental Impact Report for the proposed Long Point Resort project. Upon review, the City maintains its position of deep concern with the proposed project and its significant impacts on the City of Palos Verdes Estates.

The traffic analysis provided in the Environmental Impact Report is illogical and makes improper assumptions regarding anticipated traffic patterns. Anticipated volumes from the project along Palos Verdes Drive West, through the City of Palos Verdes Estates, are unreasonably low, not reflecting the true traffic volumes which should be expected, thus, masking the significant traffic impacts which would be experienced by the City of Palos Verdes Estates, should this project be approved. In addition, the report does not provide any analysis for the intersection of Via Corta and Palos Verdes Drive West. This intersection is utilized far beyond its capacity, requiring the City to provide a police officer for traffic control every weekday morning and causing traffic jams on Palos Verdes Drive up to a mile in length.

Exhibit G shows the project trip distribution. The graphic predicts that 45% of traffic exiting the site will travel east on Palos Verdes Drive South, towards San Pedro. The remaining 55% of traffic exiting the site is predicted to travel west on Palos Verdes Drive South, towards Hawthorne Boulevard. We strongly disagree with this model of trip distribution. It is unreasonable to assume that nearly half of trips generated by the project will access the project from the south. We expect that a much higher percentage of project trips would originate from the north.

3A

Exhibits E and F depict existing peak hour traffic volumes. During both time periods, the data indicates that of the existing northbound traffic on Palos Verdes Drive South approaching the intersection with Hawthorne Boulevard, 50% continues to travel north along Palos Verdes Drive West in the morning (286 of 574 total vehicles) and 49% continues to travel north along Palos Verdes Drive West in the afternoon (239 of 491 total vehicles), and through Palos Verdes Estates. Exhibits I and J provide the peak hour traffic volumes expected to be generated by the project. Here the numbers suggest that of the project northbound traffic on Palos Verdes Drive South approaching the intersection with Hawthorne Boulevard, only 18% is anticipated to continue north along Palos Verdes Drive West in the morning (12 of 66 total vehicles) and 18% is anticipated to travel north along Palos Verdes Drive West in the afternoon (25 of 139 vehicles). It is improper to assume that trip distribution will not follow existing trip distribution patterns and routes. We disagree with these traffic volume projections, and expect that instead, approximately half of the traffic generated by the project traveling westbound on Palos Verdes Drive South, should be expected to continue northbound along Palos Verdes Drive West and through the City of Palos Verdes Estates. Based on the peak hour volumes presented, we would expect the project to contribute an additional 33 vehicles to the morning peak hour volume northbound on Palos Verdes Drive West, which corresponds to a 6% increase. Similarly, we would expect the project to contribute an additional 69 vehicles to the afternoon peak hour volume northbound on Palos Verdes Drive West, which corresponds to an 18% increase. Southbound traffic would experience a 15% increase during the morning peak hour and a 16% increase during the afternoon peak hour. Please note that these figures are a conservative estimate as they do not factor in the additional trips due to the errant assumption described in the previous paragraph.

3A

The City of Palos Verdes Estates is very concerned with existing traffic conditions on Palos Verdes Drive West. The City is currently implementing traffic calming measures at the south City entrance on Palos Verdes Drive West to quell excessive speeds from motorists already traveling from Rancho Palos Verdes into Palos Verdes Estates. At the intersection of Palos Verdes Drive West and Via Corta, the City has implemented traffic calming measures and provided police-directed traffic control during peak hours. The City is making significant efforts to improve existing traffic conditions; any increase to traffic volumes on Palos Verdes Drive West simply cannot be handled by the City of Palos Verdes Estates.

The Traffic Study technical appendices contain a letter dated May 24, 2000 from LSA Associates regarding the revised project trip generation, internal circulation design and parking demand analysis. The letter states that the trip distribution figures are based on "marketing strategies provided by the project team and employee origins." This rationale is extremely vague and unconvincing.

In addition, we maintain our previously stated concerns regarding the following issues related to the construction process:

- Wide and Heavy Loads/ Haul Route: The City of Palos Verdes Estates does not issue wide and heavy load permits to vehicles which do not have destinations

3B

Mr. David Snow

Page 3

March 21, 2001

within the City, per our Municipal Code. All trucks transporting equipment and materials during construction must be routed outside of Palos Verdes Estates.

- Traffic During Construction: The City of Palos Verdes Estates requires that all construction traffic be diverted outside of Palos Verdes Estates.

In summary, the City of Palos Verdes Estates maintains serious concerns with the Long Point Resort Project. We respectfully request that our concerns be considered and that the project be denied if these impacts are not effectively addressed and mitigated.

Thank you for the opportunity to review and comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Allan Rigg".

Allan Rigg, P.E.

Director of Planning and Public Works

cc: James B. Hendrickson, City Manager  
Timm Browne, Police Chief

**3B**



CITY OF  
*Palos Verdes Estates*

COMMENT NO. 4

RECEIVED

MAR 30 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 27, 2001

Mr. David Snow, AICP  
City of Rancho Palos Verdes  
Department of Planning, Building, and Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

RE: LONG POINT RESORT INITIAL STUDY ENVIRONMENTAL IMPACT  
REPORT

Dear Mr. Snow:

Since our previous comments regarding the Draft Environmental Impact Report (EIR) for the proposed Long Point Resort project were submitted, an additional item has come about that should also be taken into account. As you may know, the Palos Verdes Intermediate School District has just approved a plan that will convert the current Palos Verdes Intermediate School into a high school and reopen the Margate School as an intermediate school. These changes will have a significant impact on traffic volumes and patterns within the cities of Palos Verdes Estates and Rancho Palos Verdes and should be taken into account in the final EIR that is prepared for the proposed project.

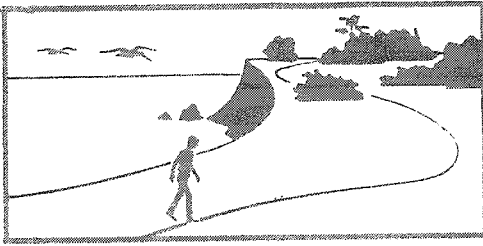
4A

Again, we appreciate the opportunity to review and comment on this project.

Sincerely,

Allan Rigg  
Director of Planning and Public Works

cc: James B. Hendrickson, City Manager  
Timm Browne, Police Chief



# COASTAL CONSERVATION COALITION

1 Peppertree Drive, Rancho Palos Verdes, CA 90275 (310) 541-1914, FAX (310) 541-4807

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April 6, 2001

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mr. David Snow  
City of Rancho Palos Verdes Planning Commission  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: Draft Environmental Impact Report for the Long Point Resort Project

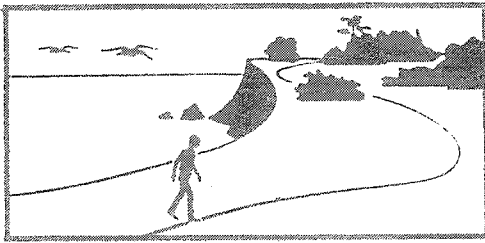
Dear Mr. Snow,

The Coastal Conservation Coalition, though not opposed to an environmentally sound redevelopment of Long Point, is unalterably opposed to projects with profound deleterious effects on local wildlife and habitat values. When they involve the loss of high-value habitat on public lands, such as is the case here with proposed conversion of Upper Point Vicente Area (UPVA) to private use, we are most distressed. And when that same conversion jeopardizes the success of the City's own Natural Communities Conservation Plan (NCCP), our distress verges on outrage.

Before going into a detailed critique of the Long Point EIR, we must stress the incompatibility of its "preferred" alternative(s) with the goals of the NCCP. The ultimate success of the NCCP depends on how well it can provide for the continuation of viable populations of the members species which make up the local coastal sage scrub ecosystem. Two birds, California gnatcatcher and cactus wren, and two butterflies, Palos Verdes blue and El Segundo blue, are of especial concern for the Long Point project. If the project is not to come into direct conflict with either the NCCP or the Endangered Species Act (ESA), it must avoid impacts to these species. When UPVA is included in the project, we do not see how this can be done.

It has been suggested that problems can be avoided by using a Habitat Conservation Plan (HCP), such as was used for Ocean Trails. We doubt this. The Ocean Trails HCP was created before the NCCP was initiated here, but was nevertheless intended to fit into, or at least be compatible with, the final NCCP program. We cannot see how an HCP can be cobbled together for Long Point which could integrate with NCCP goals and objectives. Certainly, the City, as lead agency for the NCCP should not countenance such a plan. We certainly would not.

If, as we believe, the project as described in the "preferred" alternative(s) is inconsistent with a successful NCCP, then we suggest that the criteria used to assess these alternatives be reexamined. Either the stated desire that the project be consistent with the NCCP should be adhered to, or it should be dropped. If the NCCP is to be honored, then we think that some of the other project objectives need to be modified. We should note here that we have taken the liberty to pluralize "preferred alternatives" as there seems to be a conflict at the moment between the draft EIR and the developers as to which alternative the EIR should



# COASTAL CONSERVATION COALITION

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actually justify.

If we are to take the developer's most recent selection of "preferred" alternative (pg. 7-27 et seq.), we find it instructive to draw a comparison between the amenities offered by that alternative and the "no project" alternative, which actually calls for the implementation of the currently entitled redevelopment project.

## "No Project" Amenities

400 Bed Hotel  
9-Hole Golf Course  
50 Casitas  
25,000 sq. ft. Spa/fitness Center  
30,000 sq. ft. Conference Center  
30,000 sq. ft. Market Cafe  
8 Tennis Courts

Public Park, Walks and Paths\*  
\$500,000 for San Pedro Youth Hostel\*  
Dedication of new public land

## "No Resort Villas, Option B" Amenities

400 Bed Hotel  
9-Hole Golf Course  
50 Casitas  
25,000 sq. ft. Spa/fitness Center  
65,000 sq. ft. Banquet Meeting Center

4 Tennis Courts  
7 Swimming pools/Jacuzzis  
Parking Structure  
Public Park, Walks and Paths

Taking of 60+ acres of public land

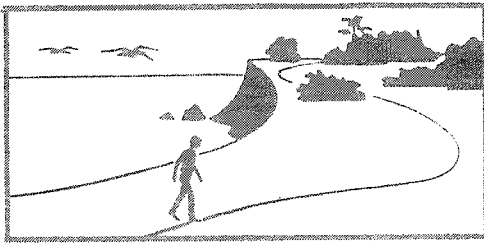
\* Conditions added by the California Coastal Commission to the Monaghan Project (i.e. the "no project" alternative) as a result of our appeal of the project to the Commission.

Except for the way in which the two alternatives treat public land, and the exchange of a promised \$500,000 for a parking structure, the two would appear to be similar quantitatively. No doubt qualitative issues will be raised by project proponents, but it is clear from the alternative offered in Section 7.9, the "Point Vicente Park Enhancement" alternative, that powerful and convincing arguments can be put forward to counterbalance—and in our opinion, overwhelm—them. When one adds the fact that 1/3 of the project area depends on the use of public land which contains some of the most valuable natural habitat in the City, it is difficult for us to understand why anyone but the developers would consider the project a public benefit. Certainly, the designation in Section 7.10 of the No Resort Villas, Option B as "the environmentally superior Alternative" is erroneous.

We see no discussion in the EIR on how this project meets low income housing requirements under State law.

5B

5C



# COASTAL CONSERVATION COALITION

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## COMMENTS ON SPECIFIC EIR SECTIONS

### 5.3 BIOLOGICAL RESOURCES

We have a number of concerns with this section. There is no sound evidence put forward to support the conclusion drawn on pg. 5.3-62, under Cumulative Impacts, that "Project implementation would not result in significant biological impacts," however effective the mitigation measures implemented might be. The suggestion at the top of the next page, that the City can go forward with project approval under the NCCP's 5% rule seems to ignore that the City has none of the 5% left. Nor is there justification for the assumption in the next paragraph that a "proposed" Long Point HCP will be sufficient. And if that is not adequate, we are assured, on pg. 5.3-63, that this project fits into the "preferred" NCCP alternative currently being discussed. Not only is that particular alternative merely one of five so far put forward, it is unacceptable to the environmental community precisely because it allows for the loss of habitat on UPVA which we are certain is crucial to the NCCP's successful outcome.

5D

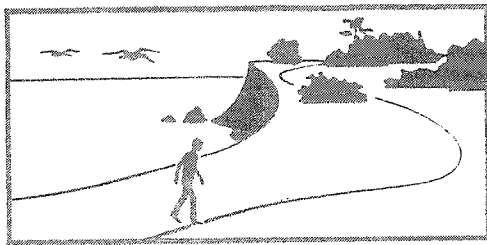
Page 5.3-25 & 26 Invertebrates; also Section 5.3-1: El Segundo Blue Butterfly

Although most attention on endangered butterflies is concentrated on the Palos Verdes blue, we think that the El Segundo blue (ESB) must be thoroughly assessed for this particular project. The discussion in the EIR is erroneous and leads to the incorrect assumption that ESB is irrelevant to the Long Point development. Furthermore, this particular issue is one that we have not yet dealt with in the NCCP, so must be considered at length in this EIR—and HCP, should one be proposed.

On the Palos Verdes Peninsula, we have two forms of the square-spotted blue butterfly, *Euphilotes battoides*. These two are closely related genetically and morphologically, and may be the same species. The coastal form is the endangered El Segundo blue *E. b. allyni*, which feeds on coastal dunes buckwheat, *Eriogonum parvifolium*. Its main population is in the LAX area, but small numbers can be found on the peninsula south to at least bluff cove. The larval host food plant is generally found on coastal dunes, but locally has adapted to certain strata along our coastal bluffs, and has been reliably reported to exist, or have recently existed, on the Long Point property. Although several miles south of the known limit for its occurrence, the El Segundo blue cannot be ruled out as being present at Long Point. It should be checked for during the expected flight season, late June through August, and if present, can be provided for in project planning, since it probably will be both highly local and in a relatively inaccessible area.

5E

The second form should be considered *Euphilotes battoides* near *allyni*, if not actually *allyni*. In either case, this population needs to be protected. Although it occurs in a number of places around the peninsula, its total population is much lower than that of the El Segundo blue colonies around LAX. The larva of this butterfly feeds on ashy-leaved buckwheat, *E. cinereum*, which is found in some abundance on UPVA, and has been reported on Long Point. It is likely that this butterfly is established on UPVA. This needs to be verified as part of the EIR, and measures need to be established to protect them if they



# COASTAL CONSERVATION COALITION

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occur. Whether this can be done in conjunction with building a golf course is highly problematic. If an HCP is proposed for the area, we believe this butterfly must be treated as an endangered species.

Pg. 5.3-33 and elsewhere: Coastal California Gnatcatcher

The discussion here is incomplete with respect to the importance of the UPVA population of California gnatcatchers. Jon Atwood, then of the Manomet Bird Observatory, pointed out that his studies showed the UPVA site to be a crucial breeding ground for gnatcatchers. Its relative isolation from disturbance and feral animals make the site a particularly successful breeding area. The result is that large numbers of young birds are able to fill in for the losses sustained among breeding bird populations in other parts of the peninsula. The loss of UPVA would be a severe blow to the NCCP and its chances for success.

Considerable store has been set on habitat restoration programs to mitigate for the destruction of intact habitat, especially with respect to the California gnatcatcher. Results from the efforts on Ocean Trails are encouraging--at least with respect to this one species--but hardly conclusive. Since the peninsula-wide Manomet breeding bird studies ended, there are no data to show how the increase in birds on Ocean Trails, Shoreline Park and the switchbacks is correlated to gnatcatcher populations elsewhere. Nor do we have anything to show that success will continue when golf and other active uses of the area commence. And, of course, we need to recognize that this kind of restoration, though well intentioned, is aimed at a very few or the hundreds of species that constitute an intact coastal sage scrub ecosystem. To suppose that habitat restoration will somehow offset loss of pristine UPVA habitat is simply to ignore reality.

5F

## Section 5.3-3 Wildlife Movement

We completely disagree with the conclusion drawn on page 5.3-62 that this project will have less than significant impacts on wildlife movement. The statement may be valid if the project does not incorporate UPVA, but the loss of UPVA as habitat would be disastrous for the movement of wildlife and the completeness of a working NCCP. As pointed out above, UPVA is a critical part of the peninsula-wide coastal sage scrub complex. Although the NCCP does not include Palos Verdes Estates as a partner, the habitat there cannot be ignored simply because it is politically convenient to do so. We think that wildlife corridors must be maintained from the south side of the peninsula to the west side. At present, the corridor hangs by two threads held together by the UPVA habitat. There is no longer a connection across the top of the hill into Agua Amarga Canyon because neither Rancho Palos Verdes nor Rolling Hills Estates strove to maintain one. Now we must rely on Rancho Palos Verdes to hold on to what is left. This EIR needs to identify this crucial aspect of the NCCP's integrity and recognize that the habitat on UPVA must be protected.

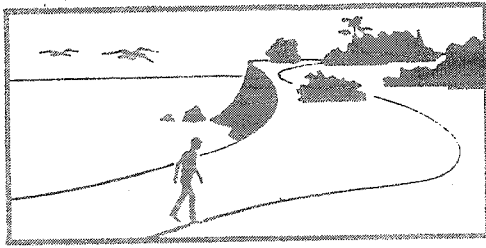
5G

## Section 5.3-5: Cumulative Impacts

We believe that the EIR analysis referred to, from which the conclusion is drawn that "Project implementation would not result in significant biological impacts with implementation of the specified

5H





# COASTAL CONSERVATION COALITION

1 Peppertree Drive, Rancho Palos Verdes, CA 90275 (310) 541-1914, FAX (310) 541-4807

mitigation and the City's development of the NCCP program," is so flawed that the opposite conclusion should be drawn. If UPVA is included in this project, not only will there be unmitigatable impacts but the NCCP will be severely compromised. It is precisely because development has eaten up so much of the coastal sage scrub that once existed around City Hall, that loss of any more could lead to the collapse of what is left. Only approval of a truly comprehensive NCCP can offer any hope of protecting what is left, consequently there is no justification for considering a project independent of it.

On page 5.3-63, we see once again a reference to some hypothetical HCP, which is supposed to address the incompatibility of this project with the NCCP. It seems unlikely that any such HCP will be approved in the foreseeable future, simply because it cannot address the issues raised by the loss of UPVA as existing and heavily used habitat. Furthermore, we believe that the final NCCP habitat reserve design will include UPVA, simply because the NCCP cannot succeed without it. For these reasons, we must also disagree with the last assertion in this section that project impacts on biological resources can be reduced to a less than significant level. On the contrary, as long as UPVA is part of this project, biological resources will be irredeemably lost.

## Pg. 7-15: No Project Alternative; Ability to Meet Project Objectives

It is stated in the EIR that this alternative "would only partially fulfill" the project's objectives for meeting open space and trails objectives. No attempt is made to justify this assertion by comparing the relative numbers and lengths of trails, especially if one combines the trails added to the original Monaghan project with the possibilities outlined in the conceptual plan offered under the Point Vicente Park Enhancement alternative. We believe that if there are alternatives that do not offer adequate trails, they are among those that require the conversion of the public land of UPVA to private use. The statement made in the EIR that the alternative in question does not "provide for a variety of public open spaces" is simply wrong.

5I

## Pg. 7-46: Point Vicente Park Enhancement; Ability to Meet Project Objectives

We disagree with the assessment that this alternative can not meet all of the Project Objectives established in Section 3.4. Since this is a stand alone proposal for UPVA, it does not preclude the "No Project" alternative, which would involve the redevelopment of the site according to the existing permit conditions. The combination meets all objectives. Indeed this combination is the only way in which all Project Objectives can be met. All other alternatives, despite assertions to the contrary on pages 7-26 and 7-27, fail.

5J

Thank you for your consideration of our concerns.

Sincerely yours,

Kay Bara



COUNTY OF LOS ANGELES • DEPARTMENT OF HEALTH SERVICES  
ENVIRONMENTAL HEALTH  
MOUNTAIN & RURAL \ WATER, SEWERAGE & SUBDIVISION CONTROL PROGRAMS  
2525 Corporate Place, Room 150, Monterey Park, CA 91754-7631  
(323) 881-4147/4158  
FAX (323) 269-4327

COMMENT NO. 6

**DHS**

**RECEIVED**

FEB 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

July 21, 2000

David Snow, AICP  
City of Rancho Palos Verdes  
Department of Planning  
Building and Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, California 90275

Re: Long Point Resort, CUP Nos. 215, 216


Dear Mr. Snow:

This is in response to the Environmental Impact Report for the above referenced property.

This Department has reviewed the environmental documents provided and is satisfied that the concerns of water supply and wastewater treatment have been adequately addressed. We have no further comments at this time.

If you have any questions or require further information, please contact me at 323-881-4157.

Very truly yours,

  
Richard Wagener, Chief  
Mountain & Rural / Water & Sewage Program

6A

## ENVIRONMENTAL DOCUMENT REVIEW NOTICE

## COUNTY OF LOS ANGELES FIRE DEPARTMENT

FEB 12 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENTCurrent Date: 2/6/01

Name/Title DAVID SNOW, AICP ✓  
 Organization CITY OF RANCHO PALOS VERDES / DEPT. OF PLANNING, Bldg. & Code Enforcement  
 Address 30940 HAWTHORNE BLVD.  
 City RANCHO PALOS VERDES State CA Zip 90275

We received the following environmental document on 2/6/01

Document Title: Preliminary DRAFT Program EIR & APPENDIX (2-vol. set)  
"LONG POINT RESORT PROJECT, GPA #28, COASTAL PERMIT #166, CUP's #215 & #216,  
TPM #26073, GRADING PERMITS #2229 & #2230, SCH #2000011076 (RANCHO PALOS VERDES)  
REF: EIR #1072/2001

We are either unable to respond at this time or our response will be delayed due to one or more of the following reasons:

\_\_\_ The above document was not received in time to develop a response by the requested date of \_\_\_\_\_. We will respond as soon as we can.

☒ ~~We did not receive the required number of copies.~~ Three Divisions within the Fire Department concurrently review and draft responses to environmental documents. Three copies of environmental documents are needed to ensure a timely response (they must be received at the same time, please send them together). Please send two more copies of the 2-vol. set (2 preliminary EIRs & 2 Appendix Volumes)

\_\_\_ Our response has been delayed by a major emergency. The staff who would normally review your document are or have been assigned to major emergencies. Thank you for your understanding.

\_\_\_ The document was improperly addressed. Please send future environmental documents to the address shown below:

County of Los Angeles Fire Department  
 Forestry Division, Rm. 123  
 5823 Rickenbacher Road  
 Commerce, CA 90040

\_\_\_ The County is the lead agency for this project. An EIR deposit fee of \$1,000 must be deposited with our Financial Management Division prior to the release of our response.

Should you have any questions regarding this memo, please call us at (323) 890-4330.

Eirform.R22 (Word)

C: Glenn Lajoie, AICP  
 RBF CONSULTING  
 14725 ALTON PARKWAY  
 IRVINE, CA 92718

7A

**FIRE DEPARTMENT**

(323) 890-4330

MAR 19 2001

8B

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDALE	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
							WHITTIER

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all weather surface of not less than the prescribed width, unobstructed, clear-to-sky. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

When a bridge is required, to be used as part of a fire access road, it shall be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds.

The maximum allowable grade shall not exceed 15% except where the topography makes it impractical to keep within such grade, and then an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topography difficulties, shall be no more than 17%. Grade breaks shall not exceed 10% in 10 feet.

Turning radii shall not be less than 42 feet. This measurement shall be determined at the centerline of the road. A fire department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

8B

1. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
2. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
3. When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block. Additional hydrants will be required if hydrant spacing exceeds specified distances.
4. A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.
5. A Fire Department approved turning area shall be provided at the end of a cul-de-sac.

**HIGH-DENSITY RESIDENTIAL:**

When cul-de-sac depth exceeds 200 feet, hydrants will be required at the corner and mid-block. Additional hydrants will be required if the hydrant spacing exceeds specified distances.

Turning radii shall not be less than 42 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs.

When serving land zoned for residential uses having a density of more than four units per net acre:

1. A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length.
2. The length of the cul-de-sac may be increased to 1000 feet if a minimum of 36 feet in width is provided.
3. A Fire Department approved turning area shall be provided at the end of a cul-de-sac.

All on-site driveways shall provide a minimum unobstructed width of 26 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The 26 foot width does not allow for parking, and shall be designated as a "Fire Lane," and have appropriate signage. The 26 feet in width shall be increased to:

1. Provide 34 feet in width when parallel parking is allowed on one side of the access way.
2. Provide 36 feet in width when parallel parking is allowed on both sides of the access way.
3. Any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map, and final building plans. Driveway labeling is necessary to ensure access for Fire Department use.

**LIMITED ACCESS DEVICES (GATES ETC.):**

1. Any single gate used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky.
2. Any gate used for a single direction of travel, used in conjunction with another gate, used for travel in the opposite direction, (split gates) shall have a minimum width of 20 feet each, clear-to-sky.
3. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right of way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
4. All limited access devices shall be of a type approved by the Fire Department.
5. Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.

Mr. David Snow, AICP  
March 15, 2001  
Page 4

**TRAFFIC CALMING MEASURES**

All proposals for traffic calming measures (speed humps/bumps, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.

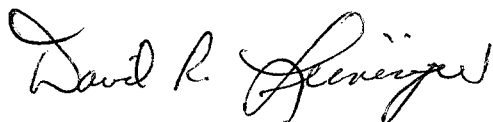
Should any questions arise regarding subdivision, water systems, or access please contact Inspector Michael McHargue at (323) 890-4243.

**FORESTRY DIVISION:**

The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department have been addressed.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



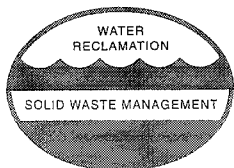
DAVID R. LEININGER, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION BUREAU

DRL:lc

8B

# 316A





# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

JAMES F. STAHL  
Chief Engineer and General Manager

February 7, 2001  
File: 31R-100.20

RECEIVED

FEB 14 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mr. David Snow, AICP  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Dear Mr. Snow:

## **Long Point Resort Project** **Draft Environmental Impact Report**

The Sanitation Districts have received your Draft Environmental Impact Report, dated February 2001, and offer the following corrections in regard to solid waste management for the above-mentioned project located in the City of Rancho Palos Verdes:

- The Puente Hills Landfill's existing local land use permit is valid through November 1, 2003, at which time it will have to be renewed to continue operations. The proposed permit renewal would extend the expected capacity of the landfill to the year 2013. (pg 5.11-8)
- The South Gate Transfer Station, under its Solid Waste Facility permit, is permitted to accept up to 1,000 tons/day, and currently receives an average of approximately 545 tons/day. (pg 5.11-9)

9A

9B

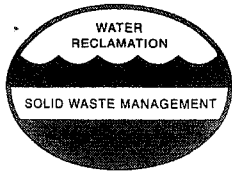
If you have any questions regarding these comments, please contact the undersigned at the above listed telephone number, extension 2456.

Very truly yours,

James F. Stahl

Felicia Ursitti  
Project Engineer  
Solid Waste Management Department

FU:wpa

COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

JAMES F. STAHL  
Chief Engineer and General Manager

March 9, 2001

File No: 05-00.04-00

**RECEIVED**

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mr. David Snow  
City of Rancho Palos Verdes  
Department of Planning, Building  
and Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275-5391

Dear Mr. Snow:

**Long Point Resort**

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on February 6, 2001. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following updated information and comments regarding sewerage service:

- The Joint Water Pollution Control Plant currently processes an average flow of 334.1 million gallons per day. **10A**
- The Districts maintain facilities within the project area which may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over a Districts' sewer is required before construction may begin. For specific information regarding the buildover procedure, please contact Ms. Jane Fong at extension 2762. **10B**
- The Upper Pointe Vicente Area Infrastructure Plan indicates direct connections to a Districts' trunk sewer. A direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit, issued by the Districts. For information regarding the permit, please contact the Public Counter at extension 1205. **10C**
- All other information concerning Districts' facilities and sewerage service contained in the document is currently complete and accurate.

Mr. David Snow

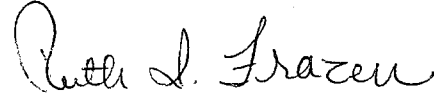
2

March 9, 2001

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Very truly yours,

James F. Stahl

A handwritten signature in cursive script, reading "Ruth I. Frazen".

Ruth I. Frazen  
Engineering Technician  
Planning & Property Management Section

RIF:rf

Enclosure

c: J. Fong



RECEIVED

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

April 5, 2001

Mr. David Snow  
 City of Rancho Palos Verdes  
 30940 Hawthorne Boulevard  
 Rancho Palos Verdes, CA 90275

**Re: Program EIR for the Long Point Resort Project**

Dear Mr. Snow:

The following comments are submitted by Destination Development Corporation, the Project developer for the proposed Long Point Resort project. We have reviewed the Draft EIR and submit the following comments for the City's consideration. If you have any questions regarding the comments or the information cited in our comments, please do not hesitate to contact me.

1. **Page 1-3:** We note that the EIR is titled a "Program EIR" and that the text on page 1-3 states that when construction-level permits for those structures and facilities not covered under this application are submitted they will need to determine whether any new impacts would occur and whether this EIR adequately addresses the project details proposed at that time. Although the City is currently considering program-level type discretionary entitlements, such as a General Plan Amendment, this EIR is also intended to be a Project-level EIR to cover approval of Conditional Use Permit Nos. 215 and 216, a Coastal Development Permit, Tentative Tract Map, Grading and Drainage Plans, and related plans and permits and provide the environmental analysis to support the following aspects of the project addressed at a construction level of detail in order to support the construction and operation of the following project elements:
  - a. Construction of the Resort Hotel (including the main hotel building, bungalows, casitas and resort villas, and construction of associated resort areas and buildings, including renovation of the Lookout Bar and construction of the five main pool areas);
  - b. Construction of the golf course, golf clubhouse, maintenance buildings, pro shop, teaching facility and golf practice area;

11A

Mr. David Snow  
City of Rancho Palos Verdes  
April 5, 2001  
Page 2

- c. Grading of the Resort Hotel Area ("RHA") and Upper Point Vicente Area ("UPVA");
- d. Construction of public parking areas, parks, and trails on RHA and UPVA; and
- e. Preservation, creation, and restoration of sensitive habitat areas on RHA and UPVA.

11A

As part of our application, we provided the City with a Permit Documentation package, dated June 23, 2000, with detailed information regarding each development component, landscape, open space and recreational trail plans, project architecture, existing and proposed infrastructure (water, storm drain and sewer), and phasing plans. As all of these plans and project features are a part of our applications, it is our understanding that the purpose and intent of this Draft EIR is to provide the environmental analysis for those discretionary actions required to construct and operate the project components described in our applications and Permit Documentation package.

2. **Page 1-4:** It may be helpful to the readers to note that in addition to the applications pending before the City of Rancho Palos Verdes listed on Page 1-2, that the EIR may be used by the Responsible and Trustee agencies listed on page 1-4 to provide the environmental review for the following additional permits and approvals:

- a. California Department of Fish and Game: Section 1603 Streambed Alteration Agreement
- b. California Regional Water Quality Control Board: Section 401 Water Quality Certification; National Pollution Discharge Elimination System (NPDES) Storm Water Permit/Construction Permit
- c. California Water Service Company Water District: Water supply and distribution; Connection permits
- d. Los Angeles County Sanitation District: Sewage Collection Treatment; Connection Permits
- e. U.S. Fish and Wildlife Service: Potential Section 7 consultation or Section 10a incidental take permit
- f. U.S. National Park Service: Amendment to the Master Plan/Program of Utilization for UPVA

11B

Mr. David Snow  
City of Rancho Palos Verdes  
April 5, 2001  
Page 3

- g. U.S. Army Corps of Engineers: Section 404 permit **11B**
3. **Page 2-3:** This EIR is also intended to provide the environmental documentation to support the City's consideration of a statutory development agreement and/or concession agreement with the City. The approval of a development agreement/concession agreement should be added to the list of discretionary actions considered by the City and analyzed in this EIR on pages 1-3, 2-2, and 3-11. **11C**
4. **Page 5.3-4, Paragraph 2:** Attached is a letter from David Levine, Natural Resource Consultants, dated March 29, 2001, which is incorporated by reference into our comments on the Draft EIR. For the reasons discussed in the letter from Mr. Levine, we believe that the area currently designated as Disturbed Chenopod Scrub should be removed from the Sensitive Natural Communities/Habitats category as it is dominated by ruderal and non-native species and does not support coastal California gnatcatchers or any other federal or State listed threatened or endangered species. **11D**
- In addition, we also compared the Draft EIR's vegetation mapping of this area to the vegetation mapping for the City's proposed NCCP and noted that the City's proposed NCCP did not identify any Disturbed Chenopod Scrub on UPVA. This area was identified in the City's proposed NCCP as Non-Native Grassland. This is inconsistent, and for the reasons cited in Mr. Levine's letter, we believe that the Non-Native Grassland is a more accurate characterization of the vegetation than the Draft EIR's.
5. **Page 5.3-43, Paragraph 3:** We suggest the following explanation of the 4d Rule and its application to the project: **11E**
- The proposed Long Point Resort Project is being considered during the interim phase of the NCCP development. Because the City does not have an approved NCCP, and because there are no remaining acres of CSS in the City's NCCP subregion that can be removed under the Section 4d special rule, any impacts to the California gnatcatcher and the CSS on the project must be approved by the U.S. Fish and Wildlife Service through either a Section 7 consultation in connection with a federal agency action, or Section 10 of the Endangered Species Act.
6. **Page 5.3-48, the Palos Verdes Blue Butterfly:** It is our understanding that the City's environmental consultant is currently conducting the focused surveys recommended in the Draft EIR to determine the presence or absence of the Palos Verdes Blue Butterfly on the project site, and that the results of the survey will be made available to the City prior to its taking action **11F**

Mr. David Snow  
City of Rancho Palos Verdes  
April 5, 2001  
Page 4

- on the project. Once those survey results are completed, we request that the information be included in the Final EIR presented to the City Council for certification. 11F
7. **Page 5.3-48, El Segundo Blue Butterfly:** Although the Draft EIR reports that the project site lacks suitable habitat for this species of butterfly, it is our understanding that the City's environmental consultant is conducting surveys to confirm that no suitable habitat exists on the project site and that this information will be made available to the City Council prior to its action on this project. Evidence that the lack of habitat has been confirmed should be included in the Final EIR presented to the City Council for certification. 11G
8. **Page 5.3-49, Line 6:** The 4.91 acres of scrub habitat should be changed to 2.21 acres since it included chenopod. As noted by David Levine in the attached correspondence, the area designated Disturbed Chenopod Scrub in the Draft EIR does not support the coastal California gnatcatcher. In addition, this area is designated by the City's proposed NCCP as Non-native Grassland. 11H
9. **Page 5.3-49, Coastal California Gnatcatcher:** The Draft EIR concludes that the project's impacts to the gnatcatcher are less than significant through implementation of the Long Point Habitat and Conservation Program which as noted previously in the Draft EIR, will provide an additional 15.70 acres of new coastal sage scrub habitat area in UPVA. The Draft EIR did not discuss the proposed phasing of habitat restoration. Based upon the project's current habitat restoration program, before impacts to 2.21 acres of coastal sage scrub habitat occurs, the project will create approximately 10 acres of new coastal sage scrub habitat within designated Conservation Areas on UPVA. Together with the 14.7 acres of coastal sage scrub that will be preserved and not impacted by development, the project will have approximately 24.7 acres of newly-created and preserved coastal sage scrub habitat on UPVA prior to development grading activities. Upon completion of grading activities, approximately 7.8 acres of the graded area will be revegetated with coastal sage scrub. Upon completion of the project, the UPVA will have approximately 32.5 acres of coastal sage scrub and southern cactus scrub habitat compared to the existing 16.8 acres of habitat that exists today. 11I
10. **Page 5.3-50:** The references to 4.91 acres of scrub habitat on UPVA should be changed to 2.21 acres since the larger figure includes Disturbed Chenopod Scrub which does not support these types of scrub-reliant species. 11J
11. **5.3-52, Pacific Pocket Mouse:** It is our understanding that the City's environmental consultant is currently conducting the focused surveys recommended in the Draft EIR to determine the presence or absence of the Pacific pocket mouse on the project site, and that the 11K

Mr. David Snow  
City of Rancho Palos Verdes  
April 5, 2001  
Page 5

results of the survey will be made available to the City prior to its taking action on the project. Once those survey results are completed, we request that the information be included in the Final EIR presented to the City Council for certification.

11K

12. **Page 5.3-53, Coastal Bluff Scrub:** The Draft EIR indicates that development of the project on the RHA will have a 0.10 acre impact on 4.54 acres of existing coastal bluff scrub. The project was designed to avoid all identified areas of coastal bluff scrub on RHA, therefore, we believe that this conclusion is based upon a mapping error and that the City's EIR consultant may have incorrectly assumed that development would remove areas of coastal bluff scrub. As it is difficult to determine the area in which the City concluded that 0.10 acres of impact would occur, we request that the City identify specifically where it believes the impact will occur; however, as stated previously, all project plans prepared by the project developer were intended to show no impact to coastal bluff scrub.

11L

13. **Page 5.3-54, Table 5.3-4:** In accordance with our prior comments, the impacts to the coastal bluff scrub from RHA development should be removed from the impacts table.

11M

14. **Page 5.3-57:** The Draft EIR has identified impacts to Section 404 and Section 1603 jurisdictional habitat as a significant impact of the project and has identified mitigation measure 5.3-2h to reduce the impact to a level of less than significant. As noted in the Draft EIR, there are areas on the RHA site that include mule fat scrub. The RHA site includes several ephemeral drainages with which the mule fat scrub vegetation identified in the Draft EIR are associated. Therefore, the discussion of ACOE and CDFG jurisdiction on the RHA site should be expanded to include the ephemeral drainages. Although the drainages do not contain sensitive habitat, other than the identified mule fat vegetation, these drainages would be considered jurisdictional waters under Section 404 of the Clean Water Act and Section 1603 of the Fish and Game Code. The acreage of the ephemeral drainages subject to Section 404 and Section 1603 jurisdiction that will be impacted by the project total approximately 0.25 acres. This figure also includes a non-vegetated ephemeral drainage on UPVA. As noted on page 5.3-57 in the Draft EIR, the mitigation for impacts to COE and CDFG jurisdictional areas which cannot be avoided will require obtaining a Section 404 Permit and Section 1603 Streambed Alteration Agreement.

11N

15. **Page 5.3-65 to 67, Mitigation Measures 5.3-1c and 1f:** As noted previously, the City's environmental consultant is currently conducting focused surveys for the Pacific pocket mouse, Palos Verdes Blue butterfly and the El Segundo Blue butterfly. The surveys identified in these measures will therefore be completed prior to certification of this Draft EIR.

11O



Mr. David Snow  
City of Rancho Palos Verdes  
April 5, 2001  
Page 6

16. **Page 5.4-8, Paragraph 3:** Based upon a site visit to ascertain the location of this site, it appears that a majority of the site, specifically the rock shelter, is located in a planning area that has been designated for conservation uses, and impacts would be avoided. **11P**
17. **Page 5.4-27, Mitigation Measure 5.4-3:** This mitigation measure requires compliance with Section 5097.98 of the Public Resources Code. Because the Code sets forth specific procedures and time frames in which compliance with those procedures must be achieved, we suggest that this mitigation measure be revised to read as follows: *"In the event Native American remains are discovered during grading/construction activities, work shall cease in the immediate area of the discovery and the Project developer shall comply with the requirements and procedures set forth in Section 5097.98 of the Public Resources Code, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the 'most likely descendant'."* **11Q**
18. **Page 5.5-16, Paragraph 4:** The Draft EIR postulates a potential landslide in the southeast corner of UPVA, and as a mitigation measure recommends a comprehensive subsurface investigation regarding the postulated landslide. (See Mitigation Measure 5.5-7b.) Since publication of the Draft EIR, the Project developer retained a state licensed geotechnical consultant to perform the additional subsurface studies recommended by Mitigation Measure 5.5-7b. The results of the subsurface investigation were prepared by Neblett & Associates and submitted to the City on March 12, 2001 and March 29, 2001. The Neblett study determined that, in fact, there are no landslides present in the "suspect area" delineated by the City's consultant. Neblett also prepared a slope stability analysis and determined that the slope exhibits adequate stability and that the area is stable. In addition, the Project developer has retained Van Beveren & Butelo, Inc. of Glendale, California to peer review the Neblett work. This peer review will be provided to the City under separate cover. **11R**
19. **Page 5.6-27:** The exhibits referenced as Exhibit 5.6-4 and 5.6-5 were not included in the Draft EIR and should be reprinted in the Final EIR. **11S**
20. **Page 5.8-43, Mitigation Measure 5.8-1e:** Please specify that the beach vehicular movement is limited to the backshore environment behind the lower beach berm. **11T**
21. **Page 5.10-34, Mitigation Measure 5.10-2a:** This measure recommends modifications to several golf holes. Specifically, it recommends that Hole 3 be changed from a Par 5 to a Par 4. The measure, however, also identifies two options to address the identified golf safety hazard. As the Project developer, it is our desire to retain the Par 5 at Hole 3. Therefore, it is our intent **11U**

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City of Rancho Palos Verdes  
April 5, 2001  
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to implement Option #2 identified in the mitigation measure and move the second landing area for Hole 3 to the right, and shorten Hole 4 to a Par 3. We note that the text on page 5.10-25 states that the second landing area should be moved 80 to 100 feet to the right, but that this figure is later doubled to recommend moving the landing area 175 feet to the right. Why did the recommendation change from one section of the EIR to another?

11U

The mitigation measure for Hole 4 recommends that the tee for Hole 5 be moved to the south and that a retaining wall be constructed around the Hole 5 tee. Because Hole 4 will be shortened, the relationship between the Hole 3 and Hole 4 fairway will be improved and avoids the need to move the Hole 5 tee. Furthermore, the suggested retaining wall would result in greater impacts to the Conservation Area surrounding the tee area than the proposed project.

22. **Page 5.12-1:** Our comments on the Traffic and Circulation Section of the Draft EIR were previously submitted to the City at its Traffic Committee meeting on March 26, 2001. We have enclosed a copy of the comments and request that they be incorporated into this comment letter and responded to as part of the Final EIR.

11V

23. **Page 7-10, Aesthetics:** The analysis of the No Project/Existing Entitlement Alternative equates the proposed Project with the development that could occur under the existing Conditional Use Permit and Coastal Development Permit ("Monaghan Project") by virtue of the fact that they both propose hotel development on RHA. There is a considerable difference between the two hotel projects based upon the amount of development proposed for the RHA under the proposed Project and the site plan that accompanied the permits for the Monaghan Project. Aesthetically, the structure proposed by the Monaghan Project was more of a "superstructure" that was located closer to the bluff and not designed with the natural surroundings of the site in mind. The building was not architecturally modeled after other facilities on the Palos Verdes Peninsula, and was a five-story monolithic box which would have substantially different aesthetic impacts than the proposed project's hotel structure.

11W

24. **Page 7-25:** As indicated at the Planning Commission meeting of March 13, 2001, the Project developer intends to modify its applications and requests that the proposed project be modified to reflect EIR Alternative 7.5, Relocate Practice Facility - Option "B" (Exhibit 7.3). As noted in the Draft EIR, this alternative would have similar impacts as the proposed project. The Draft EIR indicated certain impact areas, however, in which this Alternative may have greater impacts than the proposed project analyzed in the Draft EIR. For example, on page 7-25, the EIR indicates that Alternative 7.5 would have greater biological impacts than the proposed project. Since making the decision to modify its application, the Applicant has also been working on ensuring that the impacts of Alternative 7.5 are the same or less than the proposed project. To

11X

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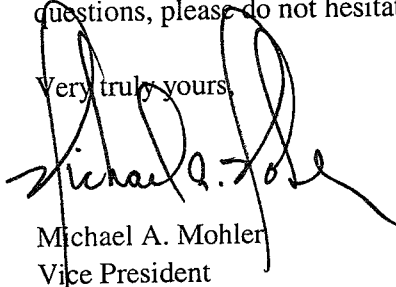
that end, enclosed is revised exhibit titled, "Conceptual Development Plan - (Revised by Applicant 3/14/2001)" which is a refinement of Alternative 7.5. This alternative shows the following:

- a. Biological Resources: The alternative would have slightly less impacts than the proposed project. This alternative utilizes the same footprint of development as the proposed project but the golf course development along the cul de sac adjacent to St. Paul's Church has been pulled back (i.e., away) from the Church, thereby providing a slightly larger habitat Conservation Area. As modified, this alternative would not result in the impacts to biological resources identified on page 7-25 of the Draft EIR in that it would not result in greater habitat fragmentation, and would not intrude on the mixed sage scrub habitat in the northeastern corner of UPVA.
- b. Golf Safety: Holes 3 and 4 have been realigned to minimize impacts to the adjacent residential area. On page 7-27, the Draft EIR notes that shots from the tee of the 3<sup>rd</sup> hole would be directed toward the residential units to the left of this hole. As modified, the tee for Hole 3 has been moved to the left, thereby reducing the chance that golf balls will be driven in the direction of the residences.

With the exception of these reduced impacts, the remainder of the impacts would remain the same or would be less than the impacts of the proposed project.

We appreciate the opportunity to submit these comments, and will review the responses prepared by the City to our questions and comments in the Final EIR. As noted in our comment letter, there is additional information that we will be providing to you, such as the peer review comments of Mr. Butelo on the Neblett study. As soon as the information is available we will submit it to the City and request that it be made a part of the City's administrative record on this project. If you have any questions, please do not hesitate to contact me.

Very truly yours,

  
Michael A. Mohler  
Vice President

Enclosures:

11X

11Y

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1. Letter from David Levine, Natural Resource Consultants, dated March 29, 2001
2. Geologic Review and Summary by Jeff Butelo, Van Beveren & Butelo, Inc., dated April 5, 2001.
3. Memorandum from Ken Wilhelm, LSA, dated March 20, 2001.
4. Conceptual Development Plan - (Revised by Applicant 3/14/2001)

## **ATTACHMENT 1**

# Natural Resource Consultants

---

March 29, 2001

Mr. Michael Mohler  
Destination Development Corporation  
11777 San Vicente Boulevard, Suite 900  
Los Angeles, California 90049

Subject: Classification of Vegetation Communities on the York Long Point Site Located in the City of Rancho Palos Verdes, County of Los Angeles, California

Dear Mr. Mohler:

Natural Resource Consultants (NRC) has reviewed the Long Point Resort Final Biological Technical Report prepared by Bonterra Consulting in February of 2001. Specifically, NRC has evaluated the classification of vegetation communities on the York Long Point Site and associated mitigation measures designed to offset project impacts. Based on NRC's evaluation, the Bonterra report incorrectly classifies Disturbed Chenopod Scrub, a disturbed community, as a "Sensitive Natural Communities". In addition, the report incorrectly applies coastal sage scrub mitigation credits (acres of coastal sage scrub revegetation) to compensate for the removal of this habitat. The inaccurate use of these mitigation credits reduces the apparent replacement ratio for impacts to coastal sage scrub habitats and masks the full extent of the project's mitigation benefits.

The vegetation communities classified in Bonterra's report provide an adequate description of the existing resources. However, it is NRC's opinion that the impacts and mitigation sections of this report have inaccurately lumped together the mitigation for loss of 2.70 acres of Disturbed Chenopod Scrub with the mitigation for true coastal sage scrub habitats. NRC has compared the plant species diversity and ecological values of the Disturbed Chenopod Scrub with Mixed Coastal Sage Scrub and with Disturbed Areas. This comparison shows that the former community 1) is dominated by ruderal and non-native species and more accurately described as a disturbed/ruderal community, 2) does not support coastal California gnatcatchers or any other federal or State listed threatened or endangered species (NRC 2001), and 3) is a relatively small habitat fragment with low ecological value.

Based on this analysis NRC suggests the following changes be made to Bonterra's report.

- 1) Disturbed Chenopod Scrub should be classified as a disturbed area and not classified as "Sensitive Natural Communities".
- 2) The impacts to 2.70 acre of Disturbed Chenopod Scrub should be eliminated from the impacts to true coastal sage scrub habitats. Specifically, the impacts to coastal sage scrub and "Sensitive Vegetation Communities" should be 2.31 acres not 5.01 acres.
- 3) The replacement ratio for loss of coastal sage scrub should be adjusted to reflect impacts to true coastal sage scrub (i.e. 16.80 acres replaced for 2.31 acres of impact or approximately 7.3-to-1).

Mr. Michael Mohler  
March 29, 2001  
Page 2 of 2

These changes provide for a more accurate disclosure of project impacts and proposed mitigations. Moreover, these changes will allow the City of Rancho Palos Verdes and other reviewing individuals and agencies to evaluate the biological benefits of the proposed project.

If you have further questions or comments on this material please contact me directly at 949.497.0931.

Sincerely,

**NATURAL RESOURCE CONSULTANTS**

A handwritten signature in black ink, appearing to read "DAF Levine". The signature is stylized with a large, looped "D" and "A", and the last name "Levine" is written in a cursive script.

David A. Levine

Cc: Ms. Ann Johnson – Bonterra Consulting

## **ATTACHMENT 2**





April 5, 2001

York Long Point Associates  
c/o Michael A. Mohler  
Destination Development Corporation  
11777 San Vicente Boulevard, Suite 900  
Los Angeles, California 90049-5011

**Subject:       Review of Prior Geotechnical Investigation Reports  
                  and Preparation of Geologic Summary  
                  Proposed Long Point Destination Resort  
                  Rancho Palos Verdes, California  
                  (Van Beveren & Butelo Project No. 00-048)**

Dear Mr. Mohler:

We are pleased to present this report of our review of geotechnical investigation reports for the subject project. Our services consisted of a review of investigation reports for the proposed Long Point Destination Resort prepared by the geotechnical firms of Neblett & Associates and Law/Crandall. These reports were provided by Mr. Dennis Lyerla and are listed as follows:

- Preliminary Geologic/Geotechnical Investigation Report, Long Point Destination Resort, Rancho Palos Verdes, California, Report co-authored by Neblett & Associates, Inc., (dated September 14, 1999) and by Law/Crandall, (dated September 27, 1999).
- Response to Review Comments by Bing Yen & Associates, Inc., Long Point Destination Resort, Upper and Lower Point Vicente Areas, Rancho Palos Verdes, California, by Neblett & Associates, dated November 11, 1999.
- Response to Review Comments by Bing Yen & Associates, Inc., Long Point Destination Resort, Upper and Lower Point Vicente Areas, Rancho Palos Verdes, California, by Neblett & Associates, dated January 21, 2000.
- Responses to Geology and Geotechnical Engineering Review Comments, Report of Geotechnical Evaluation for Environmental Impact Report, Long Point Destination Resort, 6610 Palos Verdes Drive South, Rancho Palos Verdes, California, by Law/Crandall, dated November 17, 1999.

- Response to Review Comment by Bing Yen & Associates, Inc. Long Point Destination Resort, Upper and Lower Point Vicente Areas, City of Rancho Palos Verdes, California, by Neblett & Associates, dated March 12, 2001.

## **SCOPE**

Our services consisted of a review of the above referenced reports and preparation of this summary review report that includes our findings and conclusions and the appropriate applications of those findings to the subject project. Our services included the following tasks:

- Site reconnaissance to evaluate existing conditions at each of the two areas currently proposed;
- Review of stereo-paired aerial photographs to evaluate geomorphic features in the project area;
- Review of the above referenced reports and geologic reports and maps from our technical library;
- Observations of subsurface conditions exposed in an exploratory boring in the Upper Point Vicente portion of the project
- Preparation of this summary report presenting our findings and conclusions regarding development.

A discussion of geotechnical conditions at each of the two project areas is presented in the following sections.

## **PROJECT DESCRIPTION**

The project is comprised of two areas referred to as the Upper Point Vicente Area and the Resort Center Area. The Upper Point Vicente Area covers an area of approximately 68 acres, a portion of which is currently occupied by City of Rancho Palos Verdes municipal facilities. The Resort Area consists of approximately 103 acres at the site of the former Marineland aquatic park, south of Palos Verdes Drive South. The proposed project is currently in the planning stages of development. At this time, we understand that the proposed Long Point Destination Resort will

include a combination of a resort hotel with pools, tennis courts and gardens, attached and detached villas, ancillary resort retail facilities and a regulation 9 hole golf course.

The above listed reports address these two areas as well as two additional properties referred to as the Lower Point Vicente and Subregion 1 Areas. However, at your request, our review was limited only to those portions of the reports that address the two areas currently proposed, as requested by you.

## **SITE DESCRIPTION & PROPOSED DEVELOPMENT**

### **UPPER POINT VICENTE AREA**

The upper Point Vicente Area occupies an area of approximately 68.3 acres, north and east of Palos Verdes Drive South and south of Hawthorne Boulevard in the city of Rancho Palos Verdes. The site is in a generally natural condition except for remnants of an abandoned U.S. Military defense installation consisting of artillery bunkers and missile silos. The City of Rancho Palos Verdes currently occupies a multi-story municipal facility in the upper portion of the Point Vicente Area along Hawthorne Boulevard.

Topographically, the site is characterized by gently rolling to moderately steep sloping terrain. Natural slopes at the site range from 5:1 (horizontal to vertical) in the northerly portion of the site to as steep as 2:1, in the southwesterly site limits. Cut slopes have been previously graded to as steep as 1:1 at the toe of two natural slopes apparently constructed as part of Palos Verdes Drive South roadway. Elevations at the site range from 180 feet above mean sea level, in the southeasterly portion of the site up to 370 feet in the northeasterly project limits, near Hawthorne Boulevard; a total relief of approximately 190 feet.

The Upper Point Vicente Area will be developed as a golf course and golf course maintenance facility. Conventional cut and fill grading techniques will be utilized generally in the lower portion of the site to create slopes, fairways, greens and a building pad for a maintenance building.

## **RESORT CENTER AREA**

The Resort Center Area is located at a pronounced southerly protrusion of land known as Long Point on the southern margin of the Palos Verdes Peninsula. Long Point has been shaped by Pleistocene wave cutting of hard resistant rock units that have resulted in a broad, gently sloping surface bounded by vertical cliffs along the shore line, up to approximately 145 feet high. Elevations at the site range from sea level at the shoreline in the southerly limits to 180 feet along Palos Verdes Drive South to the north, a total relief of 180 feet.

The Resort Center Area is currently occupied by several single story buildings associated with the former Marineland facility. A large asphalt concrete paved parking lot is located in the central portion of the site and other paved surfaces and landscaping surrounds the buildings. However, much of the pre-existing facility has been demolished.

The proposed development of the Resort Center Area will consist of a multi-story, world class destination resort hotel and conference center, athletic club and bungalow guestrooms; resort casitas; parking structures, golf course fairways and greens; single family residential structures, paved driveways and parking areas, restaurants and ancillary resort retail stores and services.

## **INVESTIGATIVE SCOPE AND METHODOLOGY**

The Upper Point Vicente Area was investigated by Neblett and Associates. The investigation focused upon site and regional geologic conditions, gross stability, the potential effects of regional seismic related elements and general feasibility of developing the site from a geotechnical perspective.

Their scope included: reconnaissance field mapping of road cuts and outcrops; excavation and logging of 10 backhoe pits, 5 small diameter diamond core borings to depths of up to 200 feet, 3 large diameter, solid flight-auger borings and evaluation of recent oblique stereo-paired aerial photographic reconnaissance photographs using a helicopter. Geologic structure orientation and lithologic conditions were obtained by logging the backhoe pits, down hole logging in the large

diameter borings and by a borehole image processing system utilizing oriented, down-hole camera techniques in the small diameter corings. Laboratory testing of recovered cores, and engineering analyses were performed as part of the Neblett study.

The Resort Center Area was investigated by Law/Crandall. Their investigation included an evaluation of deep-seated stability, potential bluff retreat, seismic hazards and general suitability of the site for the proposed development.

The Law/Crandall investigative scope included: geologic mapping of the bluff face along the shoreline; drilling 4 continuous core borings for the current study to depths of up to 90 feet; a review of previous investigations at the site; laboratory testing and engineering analyses.

## **GEOMORPHIC AND GEOLOGIC SETTING**

### **GEOMORPHOLOGY**

Long Point is located along the southerly margin of the Palos Verdes Peninsula at the western portion of the Los Angeles Basin. The Palos Verdes Hills are the most prominent geomorphic feature on the peninsula and reach a maximum height of approximately 1,400 feet. Glacio-eustatic sea level fluctuations and regional tectonic uplift have resulted in numerous elevated marine terrace surfaces and shoreline bluffs on the peninsula. The near vertical bluffs along this portion of the peninsula reach heights of up to 140 feet. Erosion from wave cutting along the shoreline has formed two resistant promontories in the project area known as Long Point and Point Vicente.

### **GEOLOGIC SETTING**

#### **GENERAL**

The Palos Verdes Peninsula is located at the juncture of three geomorphic provinces known as the Transverse Ranges, Peninsular Ranges and the continental borderland. The peninsula is separated from the Los Angeles Basin on the north by the Palos Verdes fault zone. The remainder of the

peninsula is bounded generally by the Pacific Ocean. Regional geologic structure is characterized by a doubly plunging anticline that trends northwest to southeast through the center of the Palos Verdes Hills. Cenozoic marine sediments of the Monterey Formation overlie a core of Jurassic basement rock known as the Catalina Schist. The Monterey Formation on the peninsula consists of the Malaga Mudstone, the Valmonte Diatomite and the Altamira Shale. The Altamira shale is the most prominent unit and underlies the subject site.

## **GEOLOGIC UNITS**

Geologic units underlying the subject site include surficial deposits and bedrock. The surficial deposits are comprised of man-placed (artificial) fill soil, slopewash, terrace deposits landslide and beach deposits. Bedrock is composed of sedimentary siltstone and shale of the Altamira Member of the Monterey Formation that has been intruded and altered by volcanic basalt.

### **ARTIFICIAL FILL**

Artificial fill occurs throughout both sites associated with previous grading of the Marineland facility, Palos Verdes Drive South and associated with a nearby residential development to the north of the Upper Point Vicente Area. Compositionally the fill consists of medium brown to gray, medium to coarse grained clayey sand and silty sand with bedrock fragments. These fills range from loose and soft to firm and medium dense.

### **BEACH DEPOSITS**

Beach deposits are limited to the shoreline area along the Resort Center Area. These deposits are associated with shoreline erosion processes and are composed generally of cobbles and boulders.

### **SEA CLIFF TALUS**

Sea Cliff Talus deposits are materials that have accumulated at the base of the bluffs. These deposits consist generally of cobbles, boulders and sand that are derived from materials exposed in the bluff faces.

### COLLUVIUM

Colluvium (or slope wash) is soil and weathered bedrock material covering slope areas. These soils are the result of gradual down slope movement due to gravity and moisture. Colluvium consists of silts, clays, sands and gravels that range from loose to moderately dense. Large boulders of cemented shale and limestone breccia were encountered in explorations within colluvium at the site.

### TERRACE DEPOSITS

Pleistocene age, marine and non-marine terrace deposits were mapped in the slope areas south of the City Hall Facilities and throughout the Resort Center Area. The terrace deposits were encountered in borings to a depth of 13 feet in the Resort Center area and are composed typically of gray brown to reddish brown silty clay to sandy clay with abundant bedrock fragments.

### BASALT

Volcanic basalt is exposed along most of the sea cliff below the Resort Center. The basalt consists of massive, resistant volcanic rock ranging from black to reddish brown. The basalt occurs as sills and dikes that have intruded the older shale units. Some tuffaceous sandstone was encountered during subsurface exploration in both areas. These tuffaceous materials represent airborne sediments ejected from a nearby volcanic vent that were deposited into the sea where volcanic activity prevented stratification that would otherwise prevail in a less active sedimentary basin.

### ALTAMIRA SHALE

The Altamira Shale Member of the middle Miocene Monterey Formation is the oldest rock unit at the site. The shale is composed of white to light gray siliceous shale, siltstone and chert with intermittent sandstone and dolomitic siltstone. These units have been intruded by the younger basalt that have disrupted continuity of the shale resulting in irregular, highly discontinuous layers lenses and blocks surrounded by basalt and volcanic breccia. Bedding plane orientation within Altamira Shale units is typically variable within a very short distance.

### **GROUNDWATER**

Groundwater was not encountered in any of the exploratory borings at the Resort Center or Upper Point Vicente Areas. Furthermore, seeps or springs were not apparent during the geologic reconnaissance mapping at the project site. The site is underlain generally by non-water bearing sedimentary and volcanic bedrock materials. Perched groundwater may occur periodically in the marine terrace deposits at the contact with underlying bedrock. As the site is bounded by the ocean, groundwater may occur in bedrock fractures close to mean sea level elevations.

### **FAULTING**

The site is not located within an Alquist-Priolo Earthquake Fault Zone (AP Zone) for surface fault rupture hazards. Active faults or features related to active faults were not observed during the recent or previous investigations. Active or potentially active faults are not known to be located beneath the site. The closest active fault to the site is the Palos Verdes fault, located approximately 5 miles to the northeast. This fault has been zoned by the state Geologist because the exact location of the fault is not well defined.

### **CONCLUSIONS**

Based upon the results of the fairly extensive geologic and geotechnical investigations performed at the site to date, the project is considered feasible for the proposed development. Slope stability,



potential landslides, cliff face retreat, faulting and seismically related effects and other geologic hazards that could affect the site, have been properly evaluated and are not considered adverse with respect to developing the site.

Large scale landslides are not present at the site. Localized landslide deposits mapped along the shoreline at the Resort Center Area can be mitigated by removal or removal and replacement with compacted fill. Sea cliff retreat has been mitigated by establishing a structural setback along the bluff face. Known, active faults do not trend toward or through the site. However, the site is located within the seismically active southern California area and will likely be subjected to strong ground motion from a major earthquake. Structures should be designed to comply with current building code requirements to resist damage from possible seismic forces. Liquefaction is not considered a hazard due to the hard and dense nature of underlying rock and the absence of groundwater.

The site is considered stable and suitable for the intended development due primarily to volcanic intrusions into the sedimentary rock during deposition. The volcanism has disrupted continuity of bedding planes, shears and other planes of weakness that could otherwise contribute to unstable slope conditions. Hydrothermal alteration associated with the past volcanic activity has cemented or welded the Altamira Formation shale beds with silica and carbonate and massive and hard volcanic basaltic rock forms the core of the bedrock underlying the site. Adverse geologic conditions responsible for large scale landsliding several miles to the east of Long Point are not present at the subject site.

Conventional foundations are anticipated for the project. Shallow spread footings in compacted fill can be used where foundations loads are light. Foundations extending into the bedrock may be used where foundation loads are high. Potentially expansive soils can be mitigated either by structural design or by treatment of the soils. The foundation and expansive soil issues will be addressed during design.

Although grading plans have not yet been developed, grading of the site can be performed by conventional cut and fill grading techniques. The hard rock units will be difficult to excavate and will likely produce oversized rock that can be used possibly as rip rap protection, crushed on-site

April 5, 2001

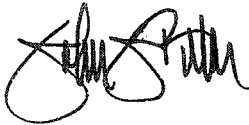
for use as aggregate, disposed of in the deeper fill areas or disposed of offsite. Additional geotechnical exploration and evaluation of subsurface materials will be necessary during future phases of project design and construction to provide recommended criteria for temporary excavations, foundations, paving and other project elements.

o O o


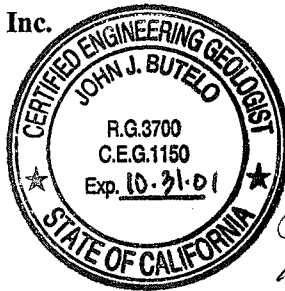
We appreciate the opportunity to be of service to you on this project. Please call if there are any questions regarding this report or if we can be of further service to you.

Sincerely,

Van Beveren & Butelo, Inc.



John Jeffrey Butelo  
Principal Engineering Geologist  
Vice President



James L. Van Beveren  
Principal Engineer  
President



00-048 r01/:JJB:  
(6 copies submitted)

cc: Mr. Dennis E. Lyerla

## **ATTACHMENT 3**

## MEMORANDUM

DATE: March 20, 2001

TO: Mike Mohler, Destination Development Corporation

FROM: Ken Wilhelm, LSA Associates, Inc.

SUBJECT: Long Point Resort EIR - Traffic and Circulation Peer Review (#2)

At your request, LSA Associates, Inc. (LSA) has reviewed the revised Long Point Resort Environmental Impact Report (EIR) Traffic and Circulation Section. As you recall, LSA submitted a memo to you on December 21, 2000, that provided comments on the first draft EIR section (dated December 13, 2001). The purpose of this memo is to review the revised EIR section (dated February 2, 2001) and confirm whether our initial comments were incorporated into the document. LSA has also reviewed the Long Point Resort Project Traffic Impact Analysis (dated January 26, 2001) as it relates to the information presented in the EIR section.

The following presents the comments based on our review. Please note that all of these comments were included in our first review and either have not been addressed or an explanation has not been provided as to why the analysis has not been revised.

1. Page 5.12-6 Analysis Methodology and page 5.12-8 Significance Criteria - The City of Palos Verdes' performance criteria for intersections is LOS D, as identified on page 5.12-6. The significance criteria identified on page 5.12-8 is the County of Los Angeles' significant impact thresholds. The two methods seem to contradict one another, and the appropriate criteria should be from the City (i.e., LOS D). Table 5.12-10 identifies a project impact at Western Avenue/25th Street. The level of service at this intersection goes from a baseline ICU of 0.765 (LOS C) to an ICU with project of 0.808 (barely LOS D). According to the City's performance criteria, this intersection is forecast to operate at an acceptable level of service and therefore no mitigation measures should be required. **11V.1**
2. The text in the EIR section on pages 5.12-14, 5.12-22, and 5.12-24 include the intersection of Palos Verdes Boulevard (NS) at Palos Verdes Drive West - South (EW) as projected to operate at LOS E or F during the peak hours. This is not correct, as identified in the level of service tables for each scenario. This intersection is forecast to operate at LOS D in the a.m. and p.m. peak hour for each scenario. The Traffic Impact Analysis correctly identifies this condition; however, this was not translated to the EIR section. **11V.2**
3. Page 5.12-33 - The text states, "the project itself is expected to have a significant traffic impact at three study area intersections projected to operate at LOS E or F during the peak **11V.3**

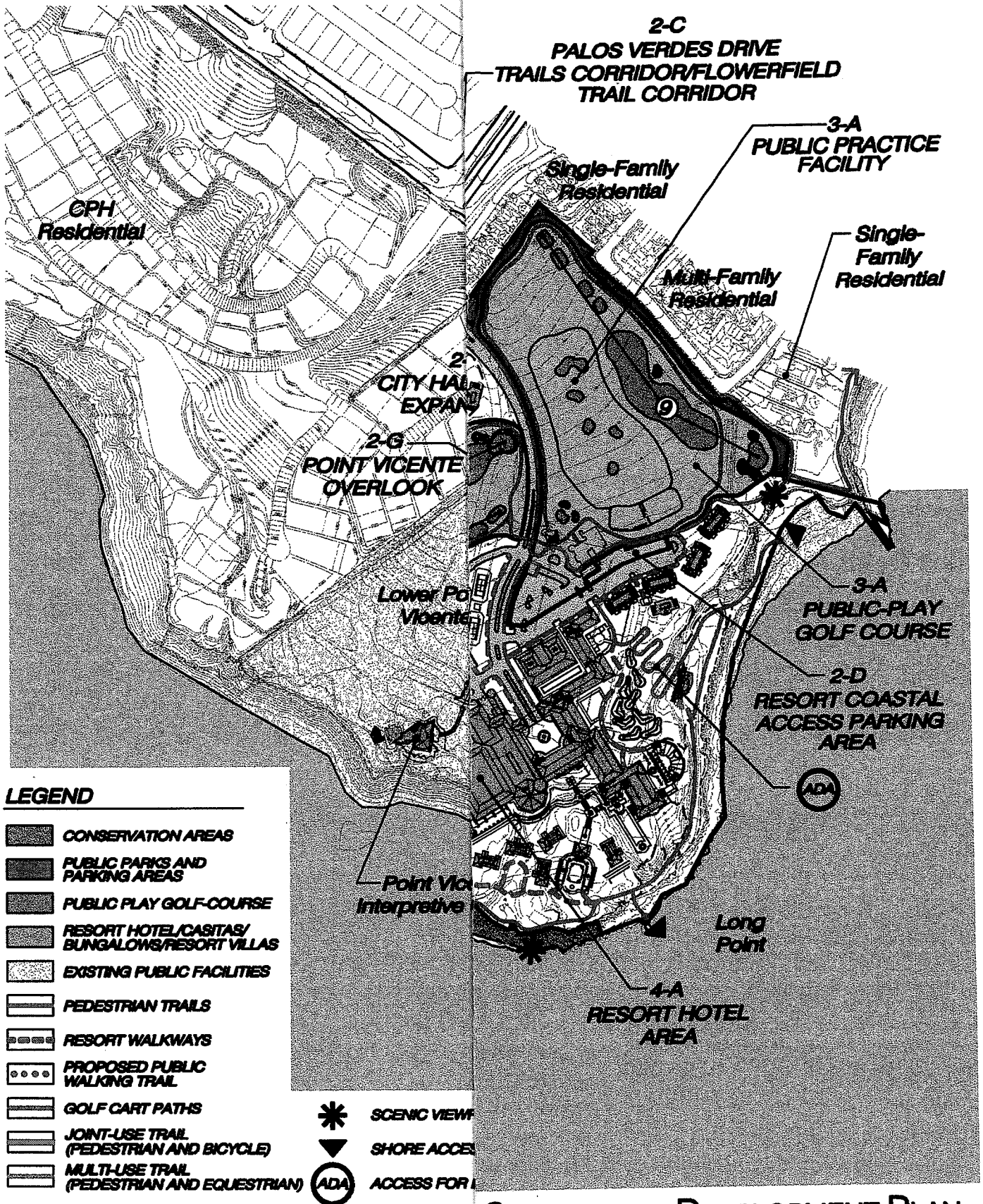
hours.” However, the intersection of Western Avenue/25<sup>th</sup> Street is forecast to operate at LOS D. Also, please see comment #1 (above).

**11V.3**

4. Page 5.12-33 and Table 5.12-11 identify the project’s fair share portion of the required circulation improvement costs. However, mitigation measure 5.12-1e (page 5.12-44) states that “prior to Occupancy Permit issuance, the Project Applicant shall make the roadway improvements.” This implies that the project applicant is fully responsible for the roadway improvements to the three impacted intersections. This mitigation measure should be rewritten to state “the project applicant shall be responsible for its fair share of these improvements (as outlined in Table 5.12-11).”

**11V.4**

## **ATTACHMENT 4**



# LONG POINT RESORT

City of Rancho Palos Verdes • California

## CONCEPTUAL DEVELOPMENT PLAN - (REVISED BY APPLICANT 3/14/2001)<sup>(1)</sup>

<sup>(1)</sup> This Conceptual Development Plan is a refinement to Draft EIR Alternative 5, titled "Relocate Practice Facility Option B". The refinement:  
a) reduces the length and realigns hole 3 and 4 away from the Villa Capri Condominiums; and  
b) provides for a new public walking trail that loops around the frontal slope of Upper Point Vicente.

APR 30 2001

**April 28, 2001**

**Mayor Lyon  
Members of the City Council  
And Planning Commission  
30940 Hawthorne Boulevard  
RPV, CA 90275**

**Dear Mayor Lyon and esteemed Council Members:**

**We are members of the Palos Verdes, Diamondback Ten and  
under Girls Softball League.**

**Please approve the Long Point Resort development.**

**Please include the development of a softball complex on the  
Lower Point Vicente property in the approval.**

**THANK YOU!**

**Diamondbacks 10-U!**

Ellen Campbell, Amanda Lippen, Amber Heckler, Meaghen Filetti, Tara Hulseay,  
Nikki Solaro, Mandy Schenasi, Taylor Pass, Michelle Mori, Elizabeth Sur,  
Lindsay Gates.

12A



## ENDANGERED HABITATS LEAGUE

*Dedicated to Ecosystem Protection and Improved Land Use Planning*

Dan Silver • Coordinator  
8424-A Santa Monica Blvd., #592  
Los Angeles, CA 90069-4267  
TEL 323-654-1456 • FAX 323-654-1931



April 6, 2001

RECEIVED

Mr. David Snow  
City of Rancho Palos Verdes Planning Commission  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: Draft Environmental Impact Report for the Long Point Resort Project

Dear Mr. Snow,

The Endangered Habitats League has been an active participant in California's Natural Communities Conservation Plan (NCCP) since its, and our, inception in 1991. We are dedicated to seeing the NCCP brought to a successful completion in each of the separate subregions as part of our overall mission to improve on existing land use planning measures and preserve representative parts of our natural heritage. Thus it is with great concern that we view the proposed project at Long Point. If development is confined to Long Point, we do not see a conflict arising with the NCCP. However, if development is allowed to extend into the Upper Point Vicente Area (UPVA), we believe prospects for a workable NCCP on the Palos Verdes Peninsula will be jeopardized.

The EIR for this project seems to us to be lacking in an objective analysis of the needs of the NCCP and how this project will interface with them. References are made to a Habitat Conservation Plan for this area as if such has already been approved. This is not the case, and it is doubtful that an implementable HCP can be designed which would address NCCP requirements, when it is finally adopted. Several points in the EIR suggest that the biological part needs considerable revision. Perhaps the least of these are the numerous misspellings and taxonomic misidentifications, those these should give anyone pause who thinks that this EIR is adequate.

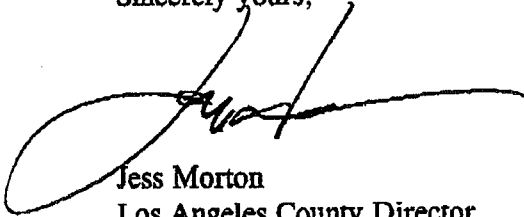
If minor points are inadequately addressed, then what of larger issues. It is here that we have the greatest concern. The importance of the successful breeding population of California gnatcatchers on UPVA is almost completely ignored, and the critical nature of it to the NCCP

13A

is not mentioned at all. The monitoring of proposed remediation programs is inadequate, and must be carried out by competent biologists who have the authority to require changes as necessary. Nor are the statements about how project alternatives meet project objectives relevant to anything but a indicative of a desire to justify a particular project outcome.

We are deeply concerned with the adequacy of this EIR. The biological portion needs much reevaluation as to its adequacy to the task at hand. We look forward to reviewing an improved version of this document.

Sincerely yours,



Jess Morton  
Los Angeles County Director

13A



LEAGUE OF WOMEN VOTERS OF PALOS VERDES PENINSULA  
P.O. BOX 2933, PALOS VERDES PENINSULA, CA 90274

**RECEIVED**

MAR 14 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mayor Lyon and all members of the City Council:

The League of Women Voters of the Palos Verdes Peninsula is firmly in support of the SOC II proposals for the Upper Pointe Vicente area.

We have long supported goals which lead to low density, the preservation of shoreline views, the expansion of open space and the preservation of public lands for public use.

We are not necessarily opposed to growth and development in appropriate places. We do not oppose the concept of a hotel and nine hole course on the York property. However we certainly do oppose turning this important, priceless public land over to the Long Point Resort Project.

We already own the land. It only needs the attention and protection it deserves.

Sincerely,

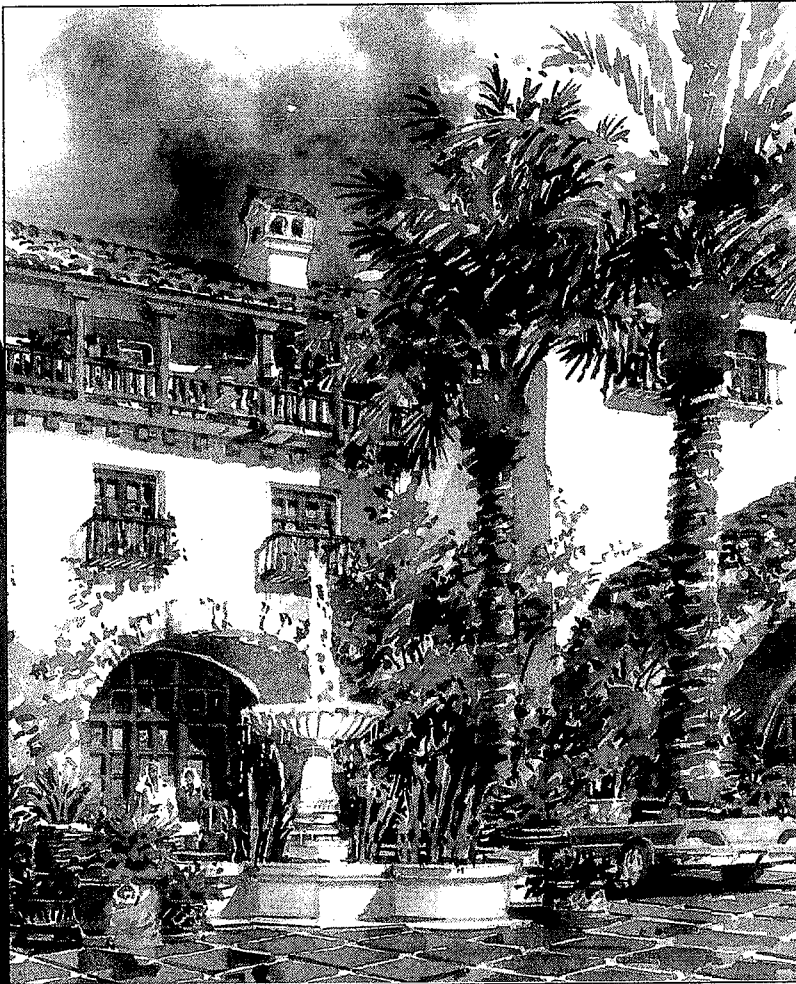
Alyda White, President, League of Women Voters  
Palos Verdes Peninsula/Sam Pedro

**14A**

### *What is the Long Point Resort?*

For nearly 15 years the former Marineland property in Rancho Palos Verdes has remained vacant and largely unused. But now, the new Long Point Resort development will restore this unique property to public and community use.

Built on over 170 acres of private land and a portion of adjacent city property, the Long Point Resort will include 32 villas and a world-class luxury hotel consisting of 400 rooms and 50 casitas. The Resort will also include unique restaurants, banquet facilities and community meeting rooms.



There will be a 9-hole golf course and practice facility – both open to the public – as well as a Spa and Fitness Center, and swimming and other recreational facilities.

The Long Point Resort will integrate these new facilities with environmentally sensitive development – preserving existing native coastal habitat, and providing new and restored habitat – protecting this part of California's coastline for the people of Rancho Palos Verdes today, and for generations to come.

### *The Long Point Resort.*

#### *Providing Public Benefits.*

The Long Point Resort will provide important benefits to the community of Rancho Palos Verdes. The Resort will create new open space and new parks, and miles of new hiking, biking and equestrian trails. It will provide new parking and coastal access. And all of this, for public use and community benefit. Specifically, the Resort will include:

- Over 80 acres of open space and recreation facilities for public use
- Over 30 acres of conserved, new and enhanced habitat areas – An 80% increase
- 11 miles of new trails – from City Hall, to the bluffs, and to the ocean
- 5 new public parks – some with picnic areas
- Improved coastal access for both fishing and other ocean activities
- 2 new general public parking facilities providing 100 new parking spaces

In exchange for a portion of the golf course on city property, the city will receive compensation from the developer through a concession agreement. Additionally, new tax revenues – over \$4.5 million – every year, will boost city revenues by approximately 50%, providing funds for other important community services.

*The entire project is more than the sum of its parts, but each part is necessary to enable the Resort to deliver full benefits to the city and community.*

The Long Point Resort...putting private and public lands into community use...creating a myriad of benefits and enjoyable opportunities for the residents of Rancho Palos Verdes.

MAR 28 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 27, 2001

Mr. David Snow  
Deputy Director, Building, Planning & Code Enforcement  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

**RE: LOWER POINT VICENTE PROPERTY SOFTBALL COMPLEX**

Dear Mr. Snow:

We have enclosed a scale drawing of a regulation size softball complex superimposed on the Lower Point Vicente property. You can see what an ideal layout this is taking into consideration the proposed expansion of the Interpretive Center and related parking areas.

We are confident that if the City had the funds it would develop additional recreation facilities for the expanding youth population on the hill. Knowing the City does not have the funds, these additional recreation facilities would appear to be dependent upon the approval of the Long Point Resort development. We support the Long Point Resort development's use of the Upper Point Vicente property for golf holes as it maintains open space, increases natural habitat, creates public accessibility via trails and park area, and beautifies a blighted fire hazard, maintenance yard, military bunker, underutilized landscape.

A few key points as to why the Upper Point Vicente property has limited league recreation use:

1. There is no flat area large enough for a regulation size softball field
2. The area is not large enough for a complex of fields, necessary for league synergy
3. No area other than the small top is flat enough, has street access, or parking
4. The Upper area could be more efficiently used as a civic center, public pool, tennis complex, teen center, or for other smaller scale community facilities.

There are very few locations on the hill that can accommodate regulation size recreation facilities without considerable grading and infrastructure expense. A few key points that support the Lower Point Vicente property for recreation fields follow:

1. A nearly flat area of appropriate size is available
2. The land is now open space and would remain open space
3. The land is not natural habitat and is currently being farmed
4. The land will need to be further disturbed to remove the lead
5. Street access is in place with turning lanes from each direction
6. Parking already exists with additional parking planned
7. Existing grade differential will minimize field view from PVDS and the PVIC
8. The cloverleaf layout will concentrate activity in the center of the site
9. The area is designated for public access recreation, neither of which exist today

**15A**

Mr. David Snow

March 27, 2001

Page 2

10. The City's conceptual 1979 plan for the site envisioned softball fields on the plan
11. The Long Point Resort developer will contribute to site development
12. The Long Point Resort DEIR included this site as an alternative driving range  
(a comparable evening and weekend use)

15A

There is a unique opportunity for the City Council, Planning Commission and Park and Recreation Department to take advantage of private development and balance it with community needs that would otherwise go unfulfilled. This is the best chance we will have for many years, if not decades, to reopen the Lower Point Vicente property, expand the Interpretive Center, and add desperately needed recreation facilities for our children.

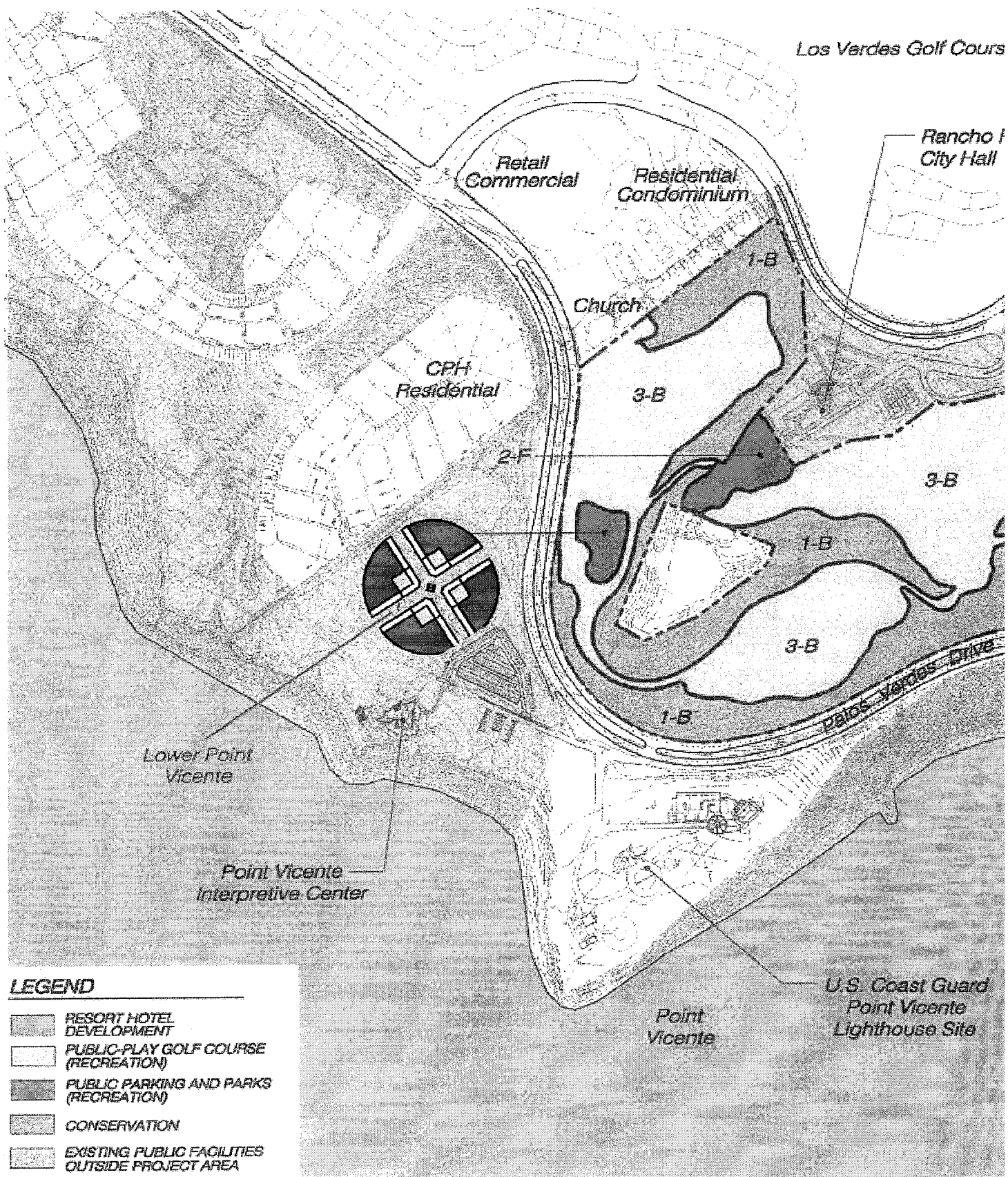
Your support is greatly appreciated.

Sincerely,






Board of Directors

Palos Verdes Girls Softball League

Enclosure



**LEGEND**

-  **RESORT HOTEL DEVELOPMENT**
-  **PUBLIC-PLAY GOLF COURSE (RECREATION)**
-  **PUBLIC PARKING AND PARKS (RECREATION)**
-  **CONSERVATION**
-  **EXISTING PUBLIC FACILITIES OUTSIDE PROJECT AREA**

March 13, 2001

Planning Commissioners  
City of Rancho Palos Verdes  
Department of Planning, Building, and Code Enforcement  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Commissioners:

We are writing this letter on behalf of Palos Verdes Peninsula Girls Softball League (PVPGSL), which includes over 400 girls ranging in ages from five to sixteen currently participating in the softball league this spring.

PVPGSL currently is sharing 3 undersized and restricted use softball fields at Cornerstone School in the midst of a dense residential neighborhood. In order to provide additional recreational opportunities to the girls living on the Palos Verdes Peninsula we are searching for a new site, on their behalf, to develop 4 regulation size softball fields to enable the league to expand. The softball complex will include 4 softball fields in a cloverleaf configuration with a main snack shop in the center. An area of approximately 8 acres (2 acres per field) will be necessary to develop these full sized softball fields.


It is our understanding that the current proposal for Long Point property as a hotel destination resort includes an alternative driving range to be located on the lower Point Vicente Park site. The developers of the Long Point project have indicated they would be willing to forego the consideration of a driving range on this site and contribute to the development of such a recreational facility that would primarily benefit the children and families of the Palos Verdes Peninsula community.

We are requesting the planning commission to consider this active recreational use that could be developed on the portion of the site that is currently used for agricultural purpose. The existing parking and restroom facilities at the Point Vicente Interpretive Center could be shared by the proposed community softball park complex. The softball fields can be designed to complement the existing passive recreational uses on the site including the pending Interpretive Center expansion.

We look forward to working with the Planning Commission, Recreation and Parks Commission, and City Council to develop a multipurpose recreational facility that meets the needs of the community.

Thank you for your kind consideration and attention to our request.

Sincerely,

  
Juan Torres  
President  
PVPGSL

Cc: Rancho Palos Verdes City Council

Submitted at P.C. Hearing:  
3-13-01

16A



**Les Evans, 05:14 PM 3/13/01 -0800, Fwd: Sierra Club Response to the Long Point DEIR**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 13 Mar 2001 17:14:41 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Sierra Club Response to the Long Point DEIR

Reply-To: <bholchin@home.com>  
From: "Barry Holchin" <bholchin@home.com>  
To: "RPV City Council \ (E-mail)" <citycouncil@rpv.com>  
Subject: Sierra Club Response to the Long Point DEIR  
Date: Tue, 13 Mar 2001 16:59:25 -0800  
X-Mailer: Microsoft Outlook CWS, Build 9.0.2416 (9.0.2910.0)  
Importance: Normal

Attached is a MS Word document containing the Sierra Club Palos Verdes South Bay Group's response to the Long Point Draft Environmental Impact Report. As the Conservation Chair, I look forward to verbally presenting our views to the Planning Commission at this evening's meeting. Thank you.

Barry Holchin  
Conservation Chair  
Sierra Club Palos Verdes South Bay Group



SC Response LP DEIR.doc

DATE: March 13, 2001

TO: Rancho Palos Verdes Mayor, Members of the City Council and Planning Commissioners

FROM: Barry Holchin, Sierra Club Palos Verdes South Bay (SC PVSB) Conservation Chair

SUBJECT: SC PVSB Response to the Long Point Draft Environmental Impact Report (LP DEIR)

---

The South Bay chapter of the Sierra Club would like to offer the following comments on the LP DEIR.

### Alternatives

We **support** the Point Vicente Park Enhancement Alternative and feel that it should be considered the Environmentally Superior Alternative.

17A

It seems that it would be useful to include an additional Alternative combining the Point Vicente Park Enhancement Alternative with the No Project Alternative.

17B

We **oppose** any alternative that proposes development on public land including:

- With Coast Guard Site Alternative
- Relocate Practice Facility - Option "A" Alternative
- Relocate Practice Facility - Option "B" Alternative
- No Resort Villas - Option "A" Alternative
- No Resort Villas - Option "B" Alternative
- Program of Utilization Alternative

17C

### Air Quality and Energy Consumption Impacts

Significant short term and long term air quality impacts, including conflicts with the AQMP and RCPG are anticipated for this project. We are extremely unhappy about the project's likely degradation of local and regional air quality. We would like to see every effort made to minimize these negative impacts by requiring the project to take whatever steps are available to reduce such impact including but not limited to:

- Short Term:** use of low sulfur diesel fuel and soot traps for heavy construction equipment
- Long Term:** use of electric golf carts; low emission (natural gas, hybrids, etc) maintenance and other vehicles; use of low emission non-diesel fueled shuttle buses for transit to/from the airport(s), the port of Los Angeles, ferries to Catalina Island, public transit (blue line etc) and other transit connections as well as to other venues of interest to guests

17D

Indirect impacts from electricity and natural gas consumption of this project are considered significant. Especially in light of the current energy debacle in California, we would like to see the project held to the following requirements:

- Energy conservation should be an integral part of the project design including but not limited to:

Design of all structures to use passive solar heating when possible  
Use of alternative energy sources such as solar water heating, etc when possible  
Use of fluorescent and compact fluorescent light bulbs, minimization of excessive lighting etc.

17D

Unless this project can offer significant measures to reduce its burden on our air quality and energy resources, we have serious doubts whether it should be allowed to proceed.

The protection and preservation of native ecosystems, communities and habitats as well as individual species and specimens of plants, animals, birds and insects must be a strong priority for this project. Habitats must be maintained in sizes and configurations that will continue to support indigenous species. Any revegetation must be with locally appropriate native species. Wildlife movement must not be disrupted or impeded by fragmentation or by barriers (such as golf course netting). Coastal access must be maintained.

17E

We are also concerned about the quality of hiking experience on the trails, particularly such issues as proximity to the golf areas or major roadways, and issues of multiple use. We would like to see a trail committee established for the project that includes representatives from our group as proactive participants. Trails must remain open to public access from 5am to 10pm daily. There should be no attempts to intimidate the public away from using the trails.

17F

We are strongly opposed to any consideration of use of publicly dedicated property for this proposal. Any and all development including golf courses must be confined to the property that the developer actually owns.

17G

We expect to make further more detailed comments on this EIR. The extreme size of the document makes it difficult to analyze the proposal itself. The main document includes many references that would be more appropriately placed in an Appendix. At the same time more specific details about the project itself are often skimpy, missing, or hard to find. Perhaps that is the intent.



## SIERRA CLUB

Palos Verdes - South Bay Group / Angeles Chapter

April 6, 2001

RECEIVED

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mr. David Snow  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: Draft Environmental Impact Report for the Long Point Resort Project

Dear Mr. Snow:

The mission of the Sierra Club is to explore, enjoy and protect the wild places of the earth; to practice and protect the responsible use of the earth's ecosystem and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In light of that mission, we submit the following comments on the adequacy of the Long Point Resort Draft Environmental Impact Report (DEIR):

The Palos Verdes – South Bay Group, Angeles Chapter, Sierra Club (PV-SB Sierra Club) is strongly opposed to any consideration of the use of the publicly owned property of Upper Point Vicente for the use of a private developer for the Long Point project. For this reason we request that the Planning Commission and the Rancho Palos Verdes City Council:

DENY York Long Point's application for a General Plan Amendment (GPA #28)

DENY York Long Point's application for a Conditional Use Permit (CUP #216)

DENY York Long Point's application for a Grading Permit (GRP #2230).

18A

We believe that the existing General Plan and Zoning of Rancho Palos Verdes should be upheld. The remaining applications for this proposed project must be carefully evaluated for compliance with existing plans and regulations, and for environmental, biological, and public access impacts. We believe that many of the conclusions of "less than significant impact" in this DEIR are unjustified and that many of these impacts will indeed be quite significant.

### ALTERNATIVES

The "Point Vicente Park Enhancement Alternative" should be designated as the "Environmentally Superior Alternative". Only that alternative protects the integrity of the environment.

### PROJECT IMPACTS

The mitigation measures proposed below should be incorporated into the final EIR and be made a part of this project, unless the lead agency can make a finding of unfeasibility [CEQA Statute 15091 (a)(3)].

### LAND USE AND RELEVANT PLANNING (Section 5.7)

#### *Conflicts with Existing Use Plans:*

#### Rancho Palos Verdes General Plan

This plan designates the Upper Point Vicente area as a combination of Institutional Public and Passive Recreational areas. Passive recreational facilities are "mostly unstructured in order to allow natural ecosystems to function with the least amount of human disturbance. Passive sites are usually used for nature studies, hiking trails, limited picnicking (sic) areas, etc." The York Long Point proposal for the use of the Upper Point Vicente area as a golf course is in **conflict with the City's General Plan** because a golf course is not a Passive Recreational use. The developer is trying to get around this by proposing that the Plan itself be changed. That is not acceptable and does not serve to reduce the impact. His "mitigation" consists solely of changing the regulations to suit his own purposes.

18B

#### Rancho Palos Verdes Development Code

The Development Code zones the Upper Point Vicente area for a combination of Institutional and Open Space Recreational uses. The Open Space Recreational designation is intended for public recreational uses. A golf course would have very restricted access, requiring a fee (probably high) and severely limited time slots when it would be available for use (availability would favor private hotel guests rather than the general public). The activity of golf itself appeals only to a very small segment of the population. The rest of us would no longer be able to even walk on public land to admire the views or to enjoy the natural habitat. The use of the Upper Point Vicente area for a golf course is in **conflict with existing zoning**. The intent of the existing zoning is for public park areas. A Conditional Use Permit should not be granted for use of the Upper Point Vicente public land for a golf course.

18C

#### Program of Utilization

The Program of Utilization (POU) was created as a requirement of the deed restriction when the Upper Point Vicente property was transferred from the Federal Government to the City of Rancho Palos Verdes. It requires that the property be used “for public park and public recreation area purposes ... in perpetuity”. A golf course on Upper Point Vicente would be in **conflict with the Program of Utilization**. This land is designated for public use as parkland and recreational space, not for the exclusive use of golfers. The POU never included a golf course as a recommended use for this space. Children don’t use golf courses.

18D

#### Conflicts with the General Plan and Existing Zoning

The conflicts with the existing General Plan, and Zoning are significant. The conflicts with the existing Deed Restrictions are significant. The developer’s primary argument seems to be that all of these conflicts can be mitigated by simply changing any rules and regulations he doesn’t like. These zoning regulations are very clear and were established for good reason. They should not be changed. The weight and intent of the existing zoning and plans is for passive public recreational uses of this publicly owned property. There is no compelling reason to change this designation. A majority of the public has spoken out, signed petitions, etc. against giving up this property for private use. Where there is a conflict of desires for this property between the developer and the public, the public’s desires and the existing zoning and plan should be favored.

18E

#### Workable Alternatives

In contrast, the area referred to as the “RHA” (Resort Hotel Area) by this DEIR is designated in RPV’s General Plan as Commercial Recreational and is zoned as Commercial Recreational and as Open Space Hazard. The Commercial Recreational designation allows for a resort/conference hotel, restaurants, tennis, golf courses, banquet facilities, etc. The Open Space Hazard Zone requires preservation of natural resources, areas of outstanding scenic, geologic, historic, or cultural value and regulations for public safety. In addition, Public Coastal Access must be maintained by law. We are not arguing against the development of a hotel and golf course complex on the privately owned property designated as RHA in this DEIR. With the exception of the Open Space Hazard Zone, the majority of this area is already zoned as Commercial Residential/Recreational and its use for hotel and golf has already been approved.

18F

The “Point Vicente Park Enhancement Alternative” to develop trails and to restore the natural habitat on the Upper Point Vicente area is consistent with all the existing plans, zoning and deed restrictions.

This DEIR should add and evaluate a **new Alternative** combining the “No Project Alternative” for the development of a hotel and golf course as currently permitted on the RHA site with the “Point Vicente Park Enhancement Alternative” for active and passive public recreation areas and the preservation of habitat on the publicly owned property of Upper Point Vicente. Such an alternative would **maintain current zoning** and be **consistent with the City’s General Plan**.

18G

We feel that the issue of inappropriate use of public property is so fundamental that by itself it is sufficient reason to deny this proposal. However, since this is our only opportunity to comment on this DEIR, we are also including the following remarks:

18H

This Draft Environmental Impact Report initially gives the impression that it must be full of all the detailed information one could need simply because of its sheer size. However, much of the content is repetitive, while

other critical elements are sorely missing. Tables and maps are inserted mid-paragraph, disrupting passages and making them hard to follow. One map was bound upside down so that it could not be opened.

18H

## **BIOLOGICAL RESOURCES** (Section 5.3)

### **Existing Biological Resources**

This DEIR's analysis of existing biological resources is inadequate and incomplete. The DEIR does not even include a list of plants and wildlife that occur on site. The vegetation surveys done by Bon Terra were done at the worst possible time of year (in August and September). In these hottest months of late summer it would be extremely difficult, if not impossible, to find and identify spring annuals and bulbs, or drought-deciduous vegetation. One can't help but wonder if surveys were intentionally scheduled at such a time to minimize the number of species that would be observed. A number of Special Status species were surveyed at inappropriate times or were not surveyed at all. Adequate surveys (including, but not limited to the Dudek surveys) of all plants and wildlife species with the potential to occur on site, including but not limited to Special Status species, must be conducted and included in the DEIR before an evaluation of impacts or discussion of mitigation can be made.

18I.1

There is no way that potential impacts can be intelligently evaluated if the existing biological resources have not been properly surveyed. Likewise, there is no way that any mitigation can be planned until these biological resources are documented and the potential impacts analyzed. This DEIR only provides a vague incomplete analysis of existing conditions. Such a poor foundation on which to determine potential impacts is unacceptable. No permits should be granted to this project until existing biological resources, potential impacts, and proposed mitigation are thoroughly documented and outlined, presented for public review, commented on, and approved by the California Department of Fish and Game and the United States Fish and Wildlife Service.

18I.2

Additionally, we question this DEIR's undervaluation of disturbed and grassland areas as being of "low biological value". All of these areas currently support wildlife. The disturbed scrub areas in particular, including mixed coastal sage scrub, southern cactus scrub, and chenopod scrub, are recognized as Special Status Vegetation types by local, state and federal agencies. These areas support a rich diversity of Special Status plants and animals.

18I.3

### **Determination of Significance**

This DEIR seems to have adopted an extremely cavalier attitude regarding the significance of impacts. The possible removal of all appropriate habitat for some species, or even the extirpation of species seems to be of little concern. (Section 5.3-2 Wildlife Impacts). The attitude stated is that if members of a species exist at all elsewhere, the developer has a right to exterminate whatever exists here. Such an attitude is appalling, especially when the developer has no right to the publicly owned land in question.

18I.4

How can extirpation of a species be considered insignificant? What threshold of significance is being used here?

18I.5

The argument that existence of a species elsewhere is assurance of the survival of that species is also flawed. There are proposals for development all over Southern California. The combined effect of these multiple projects may be enough to push some species to extinction.

Despite this DEIR's broad assurances of "less than significant" impact, the impacts on special status species, sensitive natural communities, and movement of species will indeed be significant.

18I.6

### **Mitigation**

With the exception of a detailed description of mitigation proposals for Dudleya, the vast majority of mitigation proposed in this DEIR consists solely of the repeated phrase, "impacts less than significant with mitigation." There are no other specific plans, just this flimsy generality. No matter how severe the potential impact, the flippant conclusion is always "less than significant impact with mitigation." The mitigation in this document is only very sparsely outlined, vague, and generic. There are very few specific plans. What we really seem to have here is mitigation that is less than significant!

18I.7

Obviously, mitigation plans cannot be evaluated if they are not presented. Considering how strongly this DEIR relies on "mitigation," it is telling that the mitigation proposals are only detailed for a single species! It is also troubling that many of the suggested "mitigations" rely on last minute surveys and planning well after construction

is approved and underway. This is not acceptable. Analysis of impacts and mitigations should be completed before this project is even approved. Additionally, to have the developer and a Project biologist in his employ have the final say on the adequacy or maintenance of mitigation (as is suggested in the detail for Dudleya) is neither appropriate nor acceptable; any such final evaluation should be done by the California Department of Fish and Game and the United States Fish and Wildlife Service.

In line with this criticism are this DEIR's continual references to the Long Point Habitat Conservation Plan, or "LPHCP" as mitigation. Depending on which line in the DEIR you are reading, the LPHCP either "has been implemented" or it "would need to be prepared"! The details of the LPHCP are nowhere to be found in this DEIR and the only reference is to the "Long Point Resort Permit Documentation, prepared by Forma" available for public review at City Hall. However, that document only includes Section 3 "Public Habitat Conservation Areas" whose only references to the LPHCP are as vague and generalized as in the DEIR. The only substantial detail is the "Plant Palette", which contains some highly questionable choices.

181.7

To propose that the so-called LPHCP could serve as mitigation for anything is preposterous. The LPHCP doesn't even seem to exist! It has never been presented, evaluated, or approved. None of the claims for mitigation based on the LPHCP should be accepted.

#### The NCCP

The NCCP would be the ideal tool to evaluate how this proposed projects and others should be planned in order not to disrupt habitat. Unfortunately, the regional NCCP has not yet been approved. This DEIR presumptuously claims that it is "consistent with the preferred preserve design" of the NCCP. It is only consistent with the Developer's preferred design for the NCCP. This project is not consistent with the Environmentally Preferred Preserve Design! It is also rather ironic that this DEIR mentions the NCCP's potential of "developing a habitat preserve through land acquisition" when, in fact, this project would be taking land from the city that could otherwise be used for a preserve!. It can be argued that the developer's proposal of a special LPHCP custom designed for his own project is an attempt to preclude the NCCP.

181.8

It would make far more sense to wait until the NCCP has been finalized and approved, to do the necessary surveys to determine existing biological resources, and to develop specific real mitigation plans that can be evaluated before any project such as this should be approved.

#### False Claims of Added "Habitat"

The developer claims that this project will actually "create" 16.80 acres of new coastal sage scrub habitat. Much of this so-called new "habitat" would be part of the Recreation Area, included in or surrounded by the golf course, and as such, subject to continual disturbances. The percentage of so-called "habitat" included in active golf areas is not made clear. At best, such areas could only be expected to function as Disturbed habitat, certainly not as replacement habitat.

181.9

#### Edge Effects

The concept of edge effects was only briefly mentioned in this DEIR and then let drop. In fact, this project's design with its narrow interlaced fingers of active golf course and so-called "habitat" areas has an extremely high ratio of "edges". The value of habitat is degraded by this characteristic, because of the increased exposure at the "edges" to such impacts as noise, pollutants (pesticides, herbicides, excessive water and fertilizer), non-native species, night lighting and human activity. A particularly significant edge effect next to the golf course will be the continual disturbance and trampling from golfers retrieving their balls despite fences and signs.

181.10

#### Some Specific Problems

Maps The maps all show the project area in isolation, out of context with any adjacent habitat. Several of the maps seem to use the same color for different meanings - e.g. Mixed Sage Scrub and Rocky Shore. The Biological Resource Impacts map was itself severely impacted! It was bound upside down and could not be unfolded.

181.11

Wildlife Movement Are the definitions of wildlife corridors, travel routes, and wildlife crossings given to clarify biological terms that are generally agreed upon, or is this an effort to make things seem less significant than they actually are?

181.12

USFWS Biological Opinion If it is unlikely that this project can proceed because of the USFWS Biological Opinion that no further Coastal Sage Scrub can be removed, why is this project even being proposed?

181.13

<u>Significant Impacts</u>	Despite the vague attempts at reassurance of “less than significant impact”, we remain concerned that the following impacts will indeed be quite significant if this project is implemented:	181.14
	<u>Noise</u> - particularly impacting the nesting of threatened and endangered species	
	<u>Dust</u> - impacting the respiratory function of special status plants	
	<u>Urban runoff</u> - pollutants, excessive water and nutrients impacting sensitive natural communities as well as aquatic species	181.15
	<u>Night Lighting</u> - impacting roosting and nesting species, and crepuscular animals	181.16
	<u>Human Activity</u> , particularly related to the golf course - impacting adjacent habitat areas despite signage and easily-crossed fencing	181.17
	<u>Non-Native Species</u> - not only the weedy grasses following grading, but the deliberate introduction of a number of invasive non-native species included in the project’s Plant Palette such as ivy, fountain grass, vinca and Brazilian pepper.	181.18
<u>Coastal Bluff Scrub</u>	Section 5.3-2, Sensitive Natural Communities/Habitats mentions “modification of the development plan to avoid any affect (sic) to the Coastal Bluff Scrub area”. What plan is this referring to, what modifications?	181.19

## AIR QUALITY (Section 5.2)

The document refers to the fact that the project will produce ‘significant’ air emissions, both during the construction phase (short term impacts), as well as during the operational phase (long term impacts). The document indicates that although these impacts are in excess of the SCAQMD ‘thresholds’ that would normally require the project sponsor to ‘implement control measures,’ that none are proposed as mitigation. The document uses the term ‘significant and unavoidable air quality impact.’ Since the Basin remains a non-attainment area for ozone, carbon monoxide and PM10, any additional emission caused by the project should be mitigated.

The data for ‘maximum daily emissions’ indicates that pollutants emitted are calculated to be as high as the following (from Table 5.2-2):

<u>Pollutant</u>	<u>Emissions (lbs/day)</u>	<u>Estimated Total Emissions (tons)</u>
ROG	44.62	5.3
NOx	452.83	8.5
CO	16.62	14.2
PM10	608.90	2.3

Table 5.2-3 indicates the estimated construction equipment that would be used during the construction phase of the project. Since the horsepower ratings of the equipment are not included, except for the 700 hp quoted for the portable crusher that would be used to recycle the existing paving, and possibly the concrete structural elements from the old Marineland site, it is difficult to verify what the actual emissions would be. However, we have made a reasonable estimate of equipment engine horsepower (typically 120 hp, where other information is not quoted), and used EPA’s AP-42 emission factors for diesel I/C engines. Our calculated project emissions from combustion only are included in the above table as “estimated total emissions.” The NOx emissions alone would qualify this project eligible for the SCAQMD’s RECLAIM program if this were an industrial facility.

In addition, the long term emissions attributed to this project are presented in Table 5.2-4 as calculated using the ‘worst case’ emissions. It is not known how much variability the actual long-term emissions would be from this ‘worst case’ scenario. However, if we assume that ‘average daily emissions are not significantly different than ‘worst case’ daily emissions, the annual project long term emissions are as follows, assuming 365 days/year:

<u>Pollutant</u>	<u>Daily Emissions (lbs/day)</u>	<u>Annual Emissions (tons)</u>
ROG	108.38	20
NOx	153.92	28
CO	762.42	140
PM10	45.66	8.3



Clearly, the expected emissions from this project are of a major nature, so that stating that 'no mitigation is available' is not acceptable. These annual emissions would qualify this project under the federal EPA's Title V thresholds. If this were an industrial facility, the project would be required to obtain offsets prior to construction. Thus, we would insist that some form of mitigation be required of the same magnitude of cost that emissions reduction would cost. That information is available from the SCAQMD under their 'cost effectiveness' procedures that would be used for an industrial facility wishing to install pollution causing equipment.

18J

## HYDROLOGY and DRAINAGE (Section 5.6)

Consultants for the project sponsor have calculated runoff from the Upper Point Vicente parcel. It is our concern that if this property is developed into a golf course, the regular irrigation required to maintain an acceptable turf will keep the soil nearly saturated, so that during rain events the runoff volume will be greater than expected. This, in turn, could lead to a catastrophic failure similar to that, which occurred at Ocean Trails.

18K

## INFRASTRUCTURE (Section 5.11)

The proposed sewer, water, and storm drainage lines seem to be excessively close to the bluff edge in RHA. There is also concern about proximity of the sewer line to a potential landslide in that area. There seems to be no compelling reason why those lines would need to be in that location.

In the UPVA new sewer and water lines are shown crossing areas that are nominally preserved as habitat. This is inappropriate. Habitat areas should not be disturbed for the placement of infrastructure.

18L

## RECREATION (Section 5.13)

The treatment of trails, in particular trail access and safety, is inadequate. No mention is made of time (of day) restrictions. We believe that time restrictions should be minimal if at all, perhaps to a window of 10:00 p.m. to 5:00 a.m. Regarding safety, it is not at all apparent that vegetation is sufficient protection from a golf ball.

18M

## EIR ADEQUACY

This DEIR is so lacking in substance that it should not be accepted. As shown above, many of the determinations of "less than significant impact" are not substantiated. It is our position that these impacts are instead significant. This DEIR should not be considered for approval until these issues are adequately addressed and mitigation provided to offset these impacts to a level of insignificance. A new DEIR containing specific documentation of existing Biological Resources, reasonable estimates of potential impacts, and detailed mitigation plans should be submitted. Otherwise the Applicant is depriving the public of the opportunity to adequately review and comment on a real plan.

18N

Since the Applicant now favors an Alternative other than the one addressed in this DEIR, a subsequent DEIR should be prepared reflecting that change. The subsequent DEIR should consider a new Alternative that includes the "No Project Alternative" utilizing the present permits for a hotel and golf course on the Developer's own land at Long Point together with the "Point Vicente Park Enhancement Alternative" (the SOCII proposal). Such a combined Alternative should be fully evaluated.

18O

## CONCLUSION

The PV-SB Sierra Club strongly urges the City Council to deny approval of the proposed Long Point Resort Project. The PV-SB Sierra Club is strongly opposed to any consideration of the use of the publicly owned property of Upper Point Vicente for the use of a private developer for the Long Point project. For this reason we request that the Planning Commission and the Rancho Palos Verdes City Council:

18P

- DENY York Long Point's application for a General Plan Amendment (GPA #28)
- DENY York Long Point's application for a Conditional Use Permit (CUP #216)
- DENY York Long Point's application for a Grading Permit (GRP #2230).

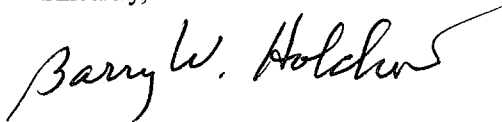
18P

It is our position that the existing General Plan and Zoning of Rancho Palos Verdes should be upheld. The remaining applications for this proposed project must be carefully evaluated for compliance with existing plans and regulations, and for environmental, biological, and public access impacts.

*(Ideally, this entire proposal should wait until the City's NCCP is completed)*  
Please contact me if we can provide any additional information.

18Q

Sincerely,

A handwritten signature in black ink that reads "Barry W. Holchin". The signature is written in a cursive, flowing style.

Barry W. Holchin  
Conservation Chair  
PV-SB Sierra Club



# South Coast Air Quality Management District

21865 E. Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • <http://www.aqmd.gov>

APR 25 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

FAXED: APRIL 20, 2001

April 20, 2001

Mr. David Snow, AICP  
City of Rancho Palos Verdes  
Department of Planning, Building and Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

**Draft Environmental Impact Report for the Proposed 168.4-Acre Long Point Resort  
Project – City of Rancho Palos Verdes**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Transportation Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

315A

Sincerely,

A handwritten signature in cursive script that reads "Steve Smith".

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC010206-02  
Control Number

**Draft Environmental Impact Report for the Proposed 168.4-Acre Long Point Resort  
Project – City of Rancho Palos Verdes**

1. The lead agency has stated in Volume I, page 5.2-15 of the DEIR “that feasible mitigation measures are not available to reduce the significance of short-term construction NOx and PM10 emissions to less than significant levels. As such, these impacts would be considered significant and unavoidable.” Beside these findings of significant impacts, the lead agency also states, “Additional measures beyond adherence to City Development Code and SCAQMD Rules are not required.” (Volume I, page 5.2-21). The SCAQMD disagrees with this finding. By definition, a mitigation measure is a means of reducing adverse environmental impacts that goes beyond existing laws and ordinances applicable to a project. For example, one means of complying with SCAQMD Rule 403 is to water actively disturbed sites two times per day, which has a control efficiency of approximately 42 percent. Watering the site one additional time per day, beyond what is required under SCAQMD Rule 403, increases the dust control efficiency to approximately 50 percent. An additional watering and/or other dust control measures would be considered feasible mitigation beyond what is required under the rule.

**315B**

In spite of the preceding paragraph, the lead agency has taken credit for mitigation measures in its calculation of short-term construction impacts (Table 5.2-2, Volume I, page 5.2-14) and in its computer modeling results (Volume II, Section 15.2) although the lead agency has not committed to mitigation measures in the Draft EIR. In the Final EIR, the lead agency should consider all applicable feasible mitigation measures that address both NOx and PM10 short-term emission impacts including measures from the South Coast Air Quality Management District’s CEQA Air Quality Handbook, Chapter 11. These measures should be listed in sufficient detail for clarity and enforcement purposes in the Final EIR.

2. In Volume II, Section 15.2 Air Quality Data, the URBEMIS 7G modeling output shows that some of the defaults have been changed. For example, the default for calculating architectural coatings emission estimates has been turned off. In the Final EIR, the lead agency should identify which defaults have been modified and include an explanation for why the architectural coatings emission estimates or any other source category estimates were not calculated.

**315C**

3. In Volume I, Section 13.0, page 13-1, paragraph three states, in part “The mitigation monitoring table below lists those mitigation measures that may be included as conditions of approval for the project. These measures correspond to those outlined in Section 2.0 and discussed in Section 5.0.” This table was omitted from page 13-1 in the Draft EIR and should be included in the Final EIR to clarify which measures the lead agency intends to implement. Finally, prior to the lead agency’s approval of the Mitigation Monitoring Plan, if there are any mitigation measures that the SCAQMD is responsible for monitoring, staff would appreciate reviewing these measures to verify that the SCAQMD has jurisdictional authority over them.

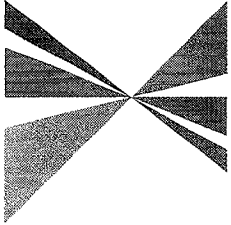
**315D**

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MAR 30 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

SOUTHERN CALIFORNIA

ASSOCIATION of  
GOVERNMENTS

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City • Andrea Puga, Corona • Ron Roberts,  
Temecula • Charles White, Moreno Valley

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Bernardino County • Bill Alexander, Rancho  
Cucamonga • Jim Bagley, Twentynine Palms • David  
Eshleman, Fontana • Lee Ann Garcia, Grand Terrace  
• Gwenn Norton-Perry, Chino Hills • Judith Valles,  
San Bernardino

Ventura County: Judy Mikels, Ventura County •  
Donna De Paola, San Buenaventura • Glen Becerra,  
Simi Valley • Toni Young, Port Hueneme

Riverside County Transportation Commission:  
Robin Lowe, Hemet

Ventura County Transportation Commission:  
Bill Davis, Simi Valley

March 28, 2001

Mr. David Snow, AICP  
City of Rancho Palos Verdes  
Department of Planning, Building and Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

RE: **Comments on the Draft Environmental Impact Report for the Long Point  
Resort Project – SCAG No. I 20010051**

Dear Mr. Snow:

Thank you for submitting the **Draft Environmental Impact Report for the Long Point  
Resort Project** to SCAG for review and comment. As areawide clearinghouse for  
regionally significant projects, SCAG assists cities, counties and other agencies in  
reviewing projects and plans for consistency with regional plans.

The attached detailed comments are meant to provide guidance for considering the  
proposed project within the context of our regional goals and policies. If you have any  
questions regarding the attached comments, please contact me at (213) 236-1867. Thank  
you.

Sincerely,

JEFFREY M. SMITH, AICP  
Senior Planner,  
Intergovernmental Review

19A

**COMMENTS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE  
LONG POINT RESORT PROJECT  
SCAG NO. I 20010051**

**PROJECT DESCRIPTION**

The proposed Project considers the development of a full service hotel providing approximately 582 guestrooms, restaurants/bars and meeting/function spaces. In addition, approximately 31.6 acres of conserved/enhanced habitat are proposed along with, 81.2 acres of public open space facilities, public parking, shoreline access ramps, public parks/overlooks, public walking/hiking trails, a public golf practice facility and a 9-hole public use golf course. The proposed Project generally involves two geographic areas, the Resort Hotel Area (RHA) and the Upper Point Vicente Area (UPVA) and encompasses approximately 168.4 acres in the City of Rancho Palos Verdes

**INTRODUCTION TO SCAG REVIEW PROCESS**

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 1998), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links

between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

### **SUMMARY OF SCAG STAFF COMMENTS**

1. The Draft Environmental Impact Report for the Long Point Resort Project is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide.
2. The Draft EIR does provide a discussion on the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act*. This discussion is on the Air Quality Management Plan. However, discussion in the Draft EIR is lacking of the consistency of the project with additional applicable regional plans, specifically the *Regional Transportation Plan*, and the *Regional Comprehensive Plan and Guide* (which incorporates references to policies in the other regional plans).
3. The Draft EIR, on page 5.2-19, references SCAG's RCPG and selected policies including 3.12, 3.13, 3.16 and 3.24. Although the policies are mentioned, a consistency analysis for each policy is not provided.
4. The Draft EIR, on page 1-7, suggests that a consistency analysis of SCAG policies can be found in Section 5.7 (Land Use and Relevant Planning). Upon review of this Section, the policies and consistency analysis are not provided. It would be helpful if the policies and consistency analysis were addressed as outlined in SCAG's, August 2, 2000 Comment Letter on the NOP for this proposed Project. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. A side-by-side comparison of SCAG policies with a discussion of the consistency or support of each policy should be provided as provided in Table 5.7-2, General Plan Consistency Analysis.
5. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.

## **CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

**The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the Long Point Resort Project.

### **Core Growth Management Policies**

*3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. The Draft EIR does not reference SCAG's Population, Household and Employment forecasts for the South Bay Cities Council of Governments subregion and the City of Rancho Palos Verdes. These forecasts are as follows:

#### **South Bay Cities Subregional**

<b>Forecasts</b>	<b>2000</b>	<b>2005</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>
Population	857,700	872,200	884,600	902,900	925,600
Households	300,000	304,200	310,800	317,100	328,200
Employment	450,200	478,300	500,500	524,600	554,400

#### **City of Rancho Palos Verdes**

<b>Forecasts</b>	<b>2000</b>	<b>2005</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>
Population	13,700	13,700	13,800	13,800	13,800
Households	5,000	5,000	5,100	5,100	5,200
Employment	2,300	2,300	2,400	2,400	2,400

It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine whether the Project is consistent with this core RCPG policy.

*3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments. The Draft EIR, on page 3-29 suggests that the



construction of the proposed Project will be completed in five phases, with a construction period consisting of 24 months. Site preparation, grading and construction of improvements and infrastructure are scheduled for Phase 1. The Project is consistent with this core RCPG policy.

The **Regional Transportation Plan (RTP)** also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

#### Core Regional Transportation Plan Policies

##### *4.01 Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.*

SCAG staff comments. The Draft EIR does not address Transportation Investments based on the following SCAG adopted Regional Performance Indicators:

*Mobility - Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient and economical movements of people and goods.*

- *Average Work Trip Travel Time in Minutes – 22 minutes*
- *PM Peak Highway Speed – 33 mph*
- *Percent of PM Peak Travel in Delay (All Trips) – 33%*

*Accessibility - Transportation Systems should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.*

- *Work Opportunities within 25 Minutes – 88%*

*Environment - Transportation Systems should sustain development and preservation of the existing system and the environment. (All Trips)*

- *Meeting Federal and State Standards – Meet Air Plan Emission Budgets*

*Reliability - Reasonable and dependable levels of service by mode. (All Trips)*

- *Transit – 63%*
- *Highway – 76%*

*Safety - Transportation Systems should provide minimal, risk, accident, death and injury. (All Trips)*

- *Fatalities Per Million Passenger Miles – 0.008*
- *Injury Accidents – 0.929*

*Livable Communities - Transportation Systems should facilitate Livable Communities in which all residents have access to all opportunities with minimal travel time. (All Trips)*

- *Vehicle Trip Reduction – 1.5%*
- *Vehicle Miles Traveled Reduction – 10.0%*

*Equity - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)*

- *Low-Income (Household Income \$12,000)) Share of Net Benefits – Equitable Distribution of Benefits*

*Cost-Effectiveness - Maximize return on transportation investment. (All Trips)*

- *Net Present Value – Maximum Return on Transportation Investment*
- *Value of a Dollar Invested -- Maximum Return on Transportation Investment*

The Final EIR should address the manner in which the Project is supportive of or detracts from the achievement of the eight core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy.

*4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.*

SCAG staff comments. The Draft EIR, in Section 5.12 (Traffic and Circulation), identifies traffic impacts. The analysis concludes that there may be significant impacts and mitigation measures are required. The Draft EIR recommends eight mitigation measures that may provide efficient and safe access to-and-from the project site. The Project is consistent with this core RCPG policy.

*4.04 Transportation Control Measures shall be a priority.*

SCAG staff comments. The Draft EIR does not provide a discussion on transportation control measures. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine whether the Project is consistent with

this core RCPG policy.

*4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity*

SCAG staff comments. See SCAG staff comments on policy 4.02. The existing transportation system will be maintained and not expanded. The Project is consistent with this core RTP policy.

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING**

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers

*3.05 Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIR, in Section 5.11 (Public Services and Utilities) acknowledges that the proposed Project will maximize the use of existing services and infrastructure. Service and Utility agencies indicate that there is adequate capacity. The Project is supportive of this ancillary RCPG policy.

*3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG staff comments on policy 3.05. The Project is supportive of this ancillary RCPG policy.

*3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR addresses subjects that may have environmental impacts. It is written in a manner, where all possible impacts are mitigated this will help minimize red tape, and help maintain the economic vitality and competitiveness of the City of Rancho Palos Verdes. In addition, the Draft

EIR, on page 3-25, includes project objectives that will also help to minimize red tape, and help maintain the economic vitality and competitiveness of the Rancho Palos Verdes. A description of approvals and permits required to implement the proposed Project are on page 3-34 of the Draft EIR. The permits and approvals will also help to maintain economic vitality and competitiveness. The Project is supportive of this ancillary RCPG policy.

### **GMC POLICIES RELATED TO THE RCPG GOAL TO IMPRVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

SCAG staff comments. The Draft EIR does not provide a discussion on public transit services that may serve the proposed Project. The proposed Project provides opportunities for users to walk and bike. However, the Draft EIR does not provide a discussion on opportunities for residents to walk or bike to the proposed Project. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine whether the Project is supportive of this ancillary RCPG policy.

- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

SCAG staff comments. See SCAG staff comments on policy 3.12. The proposed Project is an example of infill development. However, the Draft EIR does not provide a discussion on the proposed Project's accessibility to transit. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy.

Based on the information provided in the Draft EIR, we are unable to determine whether the Project is supportive of this ancillary RCPG policy

- 3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*

SCAG staff comments. The proposed Project is an example of a major commercial project with access to nearby activity centers. The Draft EIR discusses the proposed Project in the Project Description section. This section describes the proposed Project in relation to density, and development of the proposed Project adjacent to complimentary projects. The Project is supportive of this ancillary RCPG policy.

- 3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*

SCAG staff comments. See SCAG staff comments on policies 3.13 and 3.14. The Project is partially supportive of this ancillary RCPG policy.

- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*

SCAG staff comments. The Project is proposed in a manner that will minimize environmental impacts. Mitigation measures included in the Draft EIR have been recommended to address identified impacts. The City of Rancho Palos Verdes should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

SCAG staff comments. The Draft EIR in Section 5.3 (Biological Resources) provides a discussion on the biological character of the Project site and potential impacts to special status biological resources, sensitive natural communities/habitats and wildlife movement. The proposed Project will impact the aforementioned items. The Draft EIR recommends 17 mitigation measures that specifically address these impacts. The City of Rancho Palos Verdes should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

SCAG staff comments. The Draft EIR in Section 5.4 (Cultural Resources) provides discussions on archaeological/historical and paleontological resources, and burial sites. Impacts to resources will be mitigated by 15 mitigation measures recommended in the Draft EIR. The Project is supportive of this ancillary RCPG policy.

- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

SCAG staff comments. The Draft EIR, in Section 5.5 (Geology, Soils and Seismicity) discusses potential impacts related to seismicity, soils, and unstable geologic units. Mitigation measures included in this section have been recommended to address identified impacts through the implementation of studies, building codes and specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans*

SCAG staff comments. See SCAG staff comments on policies 3.18, 3.20 and 3.22. The Draft EIR, in Section 5.9 (Noise), identifies noise impacts due to construction, mobile and stationary sources. Mitigation measures described in this section have been recommended to address the identified impacts. The Project is supportive of this ancillary RCPG policy.

#### **GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY**

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. See SCAG staff comments on policy 3.05. The Draft EIR, Section 5.11 (Public Services and Utilities) suggests that the proposed Project could have impacts on police and fire services. Mitigation measures in the form of avoidance or the provision of a heli-pad, design review and standards will help to mitigate the identified impacts. The Project is supportive of this ancillary RCPG policy.

### **AIR QUALITY CHAPTER CORE ACTIONS**

The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

- 5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. See SCAG staff comments on policy 4.04. The Draft EIR, does not provide a discussion on programs and actions. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine whether the Project is consistent with this core RCPG policy.

- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments. The Draft EIR, Section 5.2 (Air Quality) addresses consistency of the proposed Project with regional and local air quality regulations and includes mitigation measures for impacts to air quality. The Project is consistent with this core RCPG policy.

## **WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS**

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

- 11.02 Encourage "watershed management" programs and strategies, recognizing the primary role of local government in such efforts.*

SCAG staff comments. The Draft Program EIR does not address the subject of "watershed management" programs and strategies. It would be helpful if the Final PEIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of this policy. Based on the information provided in the Draft Program EIR, we are unable to determine whether the Project is consistent with this core RCPG policy.

- 11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

SCAG staff comments. The California Water Service Company does not currently provide reclaimed water services for the proposed Project site. In the event that services are made available to the proposed Project site prior to construction, the proposed Project will utilize this service for golf course and landscape irrigation. The Project is consistent with this core RCPG policy.

## **OPEN SPACE CHAPTER ANCILLARY GOALS**

### **Outdoor Recreation**

- 9.01 Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*

SCAG staff comments. The Draft EIR in Sections 3.0 (Project Description) and 5.7 (Land Use) suggests that the proposed Project has adequate land resources to meet outdoor recreation needs. The project is supportive of this ancillary RCPG goal.



**9.02**    *Increase the accessibility to open space lands for outdoor recreation.*

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

**9.03**    *Promote self-sustaining regional recreation resources and facilities.*

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

**CONCLUSIONS**

1. As noted in the staff comments, the Draft Environmental Impact Report for the Long Point Resort Project is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide.

Based on the information in the Draft EIR, we are unable to determine whether the Project is consistent with core policies 3.01, 4.01, 4.04, 5.07 and 11.02. Based on the information in the Draft EIR, we are unable to determine whether the Project is supportive of ancillary policies 3.12 and 3.13. Based on the information in the Draft EIR, the Project is partially supportive of ancillary policy 3.16

2. As noted in the General Staff Comments, the Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.
3. All mitigation measures associated with the project should be monitored in accordance with CEQA requirements.

## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

Designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134(g)-(h), 49 U.S.C. '1607(f)-(g) et seq., 23 C.F.R. '450, and 49 C.F.R. '613. The Association is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

Responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Responsible, pursuant to California Government Code Section 65089.2, for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

The authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans.

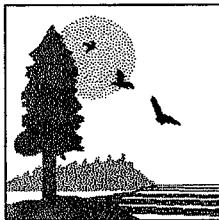
The authorized *Areawide Waste Treatment Management Planning Agency*, pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)

Responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

**CALIFORNIA STATE LANDS COMMISSION**

100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825-8202

**PAUL D. THAYER**, Executive Officer

(916) 574-1800 FAX (916) 574-1810

California Relay Service From TDD Phone **1-800-735-2922**  
from Voice Phone **1-800-735-2929**

**Contact Phone: (916) 574-1892****Contact FAX: (916) 574-1925**

March 21, 2001

File Ref: SCH 2000071076

Ms. Nadell Gayou  
The Resources Agency  
1020 Ninth Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814

Mr. David Snow, AICP  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

**RECEIVED**

MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Ms. Gayou and Mr. Snow:

**SUBJECT:** Draft Environmental Impact Report (EIR) for the Long Point Resort  
Project, SCH 2000071076

Staff of the California State Lands Commission (CSLC) has reviewed the subject document. Under the California Environmental Quality Act (CEQA), the City is the Lead Agency and the CSLC is a Responsible and/or Trustee Agency for any and all projects that could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters.

The State acquired sovereign ownership of all tidelands and submerged lands and beds of navigable waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all the people of the State for statewide Public Trust purposes that include, waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. The landward boundaries of the State's sovereign interests are generally based upon the ordinary high water marks of these waterways as they last naturally existed. Thus, such boundaries may not be readily apparent from present day site inspections. The State's sovereign interests are under the jurisdiction of the CSLC.

The Draft EIR addresses a proposed multi-faceted destination resort encompassing approximately 168.4 acres of blufftop in the city of Rancho Palos Verdes. The project will include habitat conservation/enhancement, public recreational facilities

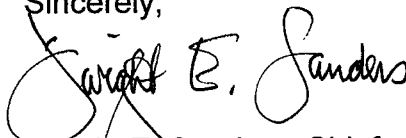
**20A**

including parking, trails, access ramps, public golf course, and a full service hotel and resort villas.

The project proposes storm drain improvements that would convey flows to two discharge pipes with rock riprap energy dissipators located at the base of the bluffs. There is insufficient information in the Draft EIR to determine the precise location of these discharge pipes in relation to or their impacts on sovereign lands under the jurisdiction of the CSLC. CSLC staff will need to review detailed plans for this aspect of the overall project in order to make such a determination.

Thank you for the opportunity to comment. If you have any questions concerning the CSLC's jurisdiction, please contact Jane E. Smith, Public Land Management Specialist, at (916) 574-1892.

Sincerely,

A handwritten signature in black ink that reads "Dwight E. Sanders". The signature is stylized with a large, looping "D" and "S".

Dwight E. Sanders, Chief  
Division of Environmental Planning  
And Management

cc: Jane E. Smith  
OPR

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Gray Davis  
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research  
State Clearinghouse



RECEIVED

Steve Nissen  
DIRECTOR

MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 23, 2001

David Snow  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Subject: Long Point Resort Project (General Plan Amendment #28 Coastal Permit #166, Conditional Use Permit #215 & 216, Tentative Parcel Map # 26073 & Grading Permit  
SCH#: 2000071076

Dear David Snow:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 22, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts  
Senior Planner, State Clearinghouse

Enclosures  
cc: Resources Agency

21A

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2000071076  
**Project Title** Long Point Resort Project (General Plan Amendment #28 Coastal Permit #166, Conditional Use  
**Lead Agency** Permit #215 & 216, Tentative Parcel Map # 26073 & Grading Permit  
Rancho Palos Verdes, City of

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**Type** EIR Draft EIR  
**Description** The Long Point Resort involves a full-service hotel providing approximately 550 guestrooms, 32 villas, restaurants/bars, and meeting/function spaces. Also proposed are approximately 40.2 acres of conserved/enhanced habitat and approximately 81 acres of public open space/recreation facilities including public parking, shoreline access ramps, public parks/overlooks; public walking/hiking trails, a public golf practice facility, and a 9-hole public-use golf course.

---

**Lead Agency Contact**

**Name** David Snow  
**Agency** City of Rancho Palos Verdes  
**Phone** 310-544-5228 **Fax**  
**email** davids@rpv.com  
**Address** 30940 Hawthorne Boulevard  
**City** Rancho Palos Verdes **State** CA **Zip** 90275

---

**Project Location**

**County** Los Angeles  
**City** Rancho Palos Verdes  
**Region**  
**Cross Streets** Palos Verdes Drive South/Hawthorne Boulevard  
**Parcel No.** Multiple  
**Township** 5S **Range** 15W **Section** **Base**

---

**Proximity to:**

**Highways**

**Airports**

**Railways**

**Waterways** Pacific Ocean

**Schools**

**Land Use** Resort Hotel Area: Commercial-Recreational; Urban Activities and Socio-Cultural Overlay Control Districts; and Specific Plan District. Upper Point Vicente Area: Recreational Passive; institutional Public; and Natural Overlay Control District.

Zoning: Resort Hotel Area: Commercial Recreational (CR) and Open Space-Hazard (OH). Upper Point Vicente Area: Open Space Recreational (OR) and Institutional (I).

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**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Coastal Zone; Forest Land/Fire Hazard; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Job Generation; Housing; Minerals; Noise; Public Services; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

---

**Reviewing Agencies** Resources Agency; Department of Boating and Waterways; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Department of Fish and Game, Marine Region; Office of Historic Preservation; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; State Lands Commission

**Document Details Report**  
**State Clearinghouse Data Base**

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***Date Received*** 02/06/2001

***Start of Review*** 02/06/2001

***End of Review*** 03/22/2001



# United States Department of the Interior

NATIONAL PARK SERVICE  
Pacific West Region  
Pacific Great Basin Support Office  
600 Harrison Street, Suite 600  
San Francisco, California 94107-1372

IN REPLY REFER TO:

L2623(PGSO-PP)

AUG 28 2000

Joel Rojas, Director  
Planning, Building and Code Enforcement  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

RECEIVED

SEP 01 2000

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: Input for Scoping to Long Point Resort Project Environmental Impact Report

Dear Mr. Rojas:

In response to your notice of a Draft Environmental Impact Report for the Long Point Project, the National Park Service offers the following input to help facilitate the use of your Environmental Impact Report (EIR) in our National Environmental Policy Act (NEPA) compliance for the above project.

1. As we expressed to you in our letter of June 26, 2000, the National Park Service is legally prohibited from approving any change of use to the parcel of land which we transferred to the City of Rancho Palos Verdes that would jeopardize the California coastal gnatcatcher, federally listed as an endangered species. We encourage the proponents of the Long Point Development to develop and analyze a full range of alternatives for their project, including those, which will not jeopardize existing gnatcatcher habitat.
2. Because of concerns regarding the proposed change of use of the land we transferred, the National Park Service requests that the EIR address the impacts that this proposal will have on public access to open space and coastal access in your community.

We appreciate the opportunity to participate in your environmental impact report.

Sincerely,

Jeff McCusker  
Outdoor Recreation Planner

22A

22B



COMMENT NO. 313

**United States Department of the Interior****NATIONAL PARK SERVICE**

Pacific West Regional Office  
600 Harrison Street, Suite 600  
San Francisco, California 94107-1372

IN REPLY REFER TO:  
L2632 (PGSO-PP)

APR 09 2001

RECEIVED

Mr. Dave Snow  
Deputy Director of Planning, Building  
and Code Enforcement  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

APR 09 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: Comments on Draft Environmental Impact Report for Long Point Resort Project

Dear Mr. Snow:

The National Park Service (NPS) has reviewed the Environmental Impact Report for the Long Point Resort Project, and we appreciate the opportunity to participate in this planning process. We believe the DEIR portrays an adequate range of development alternatives, and we are satisfied with the public involvement process that the city is undertaking. We offer the following comments:

1. We approved the Program of Utilization (POU) for the Point Vicente Property in 1976 and it paints a picture of significantly less development for the site than a conceptual plan that was developed in 1979 (see page 21 and figure 6 of enclosed application). A copy of the POU that we approved is enclosed with these comments. The DEIR however, presents the conceptual plan for development, which we do have partially in our files. Although the NPS never objected to this document, it should be clear that neither do our records show it being accepted as a POU.

Both the 1976 POU and the 1979 Conceptual Plan documents were developed before many of the biodiversity issues on the property became known. For this reason, we would now favor public recreational uses of the property known as Upper Point Vicente which have the fewest impacts on biological resources given the information now available. The NPS generally favors preservation of native habitat over replacement of restored habitats. The "No Development", "No Project" and "Point Vicente Park Enhancement" alternatives would seem to best meet these criteria, and have the most likelihood of being accepted, given our obligations under Federal laws, including the Endangered Species Act of 1973, as amended.

313A

National Park Service  
Page 2


2. We think that Exhibits 5.3-1 and 5.3-2 "Biological Resources within the Resort Hotel Area" which depict birds and vegetation as point features should indicate exactly what the point symbols mean. We suspect that these maps show nesting sites and observations of specially listed plants. If so, it would be useful to indicate this in the legend on the map.
3. The policy of the NPS Federal Lands to Parks Program is to defer to local governments in deciding how properties we have transferred have been developed within the legal and policy constraints of our program. Further since the golf course was not within the POU previously submitted to this office. If that alternative is pursued it will need approval consistent with applicable laws.

313B

313C

If you have any questions regarding these comments or the terms of conditions of deed transferring the Upper Point Vicente property, please contact Jeff McCusker at 415-427-1324.

Sincerely,



John J. Reynolds,  
Regional Director, Pacific West Region

Enclosure: Application to Bureau of Outdoor Recreation, Department of the Interior  
March 1, 1976 LADA Nike Site 55, Point Vicente, Rancho Palos Verdes,  
California GSA Number 9-D-Calif-1088

cc: Mary Beth Woulfe, U.S. Fish and Wildlife Service, Carlsbad Fish and  
Wildlife Office, 2730 Loker Avenue, Carlsbad, CA 92008

U.S. Department  
of Transportation

United States  
Coast Guard



Commander  
Maintenance & Logistics  
Command Pacific

Coast Guard Island, Bldg 54D  
Alameda, CA 94501-5100  
Staff Symbol: sp  
Phone: (510) 437-3511  
FAX: (510) 437-5753

16475  
April 6, 2001

Mr. David Snow, AICP  
Department of Planning, Building and Code Enforcement  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Subject: *Preliminary Draft Program Environmental Impact Report for the Long Point Resort Project (General Plan Amendment No. 28, Coastal Permit No. 166, Conditional Use Permit Nos. 215 & 216, Tentative Parcel Map No. 26073, Grading Permit Nos. 2229 & 2230), and Appendix to Draft, February 2, 2001*

Dear Mr. Snow:

Thank you for requesting Coast Guard review and comments on the subject, two-volume preliminary draft Environmental Impact Report, hereinafter referred to as the "DEIR". This letter will address potential impacts on Coast Guard property located within the Upper Point Vicente Area (UPVA) that is proposed to be surrounded by land uses described in the DEIR. Coast Guard property interests potentially affected by DEIR proposals are the 3.9-acre parcel, Bunker No. 240 located mostly within this parcel, and the Coast Guard utility easement extending from the Coast Guard parcel to Palo Verdes Drive South. At this time, antennae owned by the Coast Guard and two tenants are located on the 3.9-acre parcel. Please be advised that the Coast Guard has not declared this property excess and must evaluate this parcel, together with other Coast Guard properties, for future use, e.g., as part of future communication networks.

23A

An alternative presented in the DEIR, as depicted in Exhibit 7-1 and described in Sections 2.3 and 7.3, was to utilize the 3.9-acre Coast Guard parcel by dividing it into 1.2 acres for golf course expansion, 1.8 acres for native habitat, and 0.9 acres for City Hall Park expansion. The DEIR also proposed a nature trail inside the perimeter of the Coast Guard parcel in Exhibit 7.6. In Part 5.4 of Section 2.2 it was noted that demolition of the World War II bunker that straddles both City and Coast Guard property might be "unavoidable". In DEIR Exhibits 7-2, 7-3, 7-4, 7-5, and 5.13-1, golf cart paths and pedestrian trails were depicted up to, and around the Coast Guard parcel, but no motor vehicle access road to the parcel was shown in any DEIR exhibits.

23B

The Coast Guard requests that the DEIR follow through on the assumption noted on Exhibits 3-3, 5.3-4, 5.3-6, 5.7-2, and 5.11-2, and stated on pages 3-1 and 5.10-10, that the Coast Guard site is not part of the proposed project. Also, we request that the suggested multiple land uses on Coast Guard property described above be deleted. The proposal on pages 5.4-24 and 8-10 of the DEIR to possibly demolish all or a portion of historic Bunker 240 that extends over the boundary of the Coast Guard 3.9-acre parcel into City property is not feasible. The entire bunker was transferred by General Services Administration (GSA) to Coast Guard, together with the 3.9-acre parcel and 40-foot wide, 0.52-acre utility easement and, therefore, Coast Guard controls the

23C

16475

April 6, 2001

entire bunker. It cannot be demolished without Coast Guard permission. Because it has six and seven-foot thick walls, it would be difficult to destroy it. The "preferred" option, noted in Section 2.2, part 5.4-1c, and on pages 5.4-20, 5.4-24, and 8-10, to preserve Bunker 240 is endorsed by the Coast Guard. Bunker 240 is likely to be eligible for listing in the National Register of Historic Places, and it was acknowledged on page 5.4-19 of the DEIR that it is qualified for listing in the State of California Register. Any change would require a National Historic Preservation Act Section 106 consultation with the State Historic Preservation Officer (SHPO). Furthermore, any attempt to demolish the bunker may cause further damage to archaeological site "CA-LAN-103" located just downslope from it as noted on DEIR page 5.4-8.

23C

As stated in the DEIR on pages 3-4 and 5.7-2, a fire road extends from City Hall to the Coast Guard site. There will be a continuing need for utility vehicle access by Coast Guard and its tenants. It is requested that an access road be included in the exhibits and discussed in the narrative. None of the exhibits in the DEIR show the Coast Guard's 40-foot wide, 0.52-acre utility easement that extends from the 3.9-acre parcel to Palos Verdes Drive South for the purpose of providing service to the Coast Guard Point Vicente Light Station. If the City or developer prefer to relocate or underground the electrical utility line, this may be acceptable to the Coast Guard, but the service cannot be interrupted.

23D

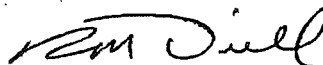
23E

An issue raised in Section 2.2, part 5.10-1h, and on pages 5.10-12, 5.10-14, 5.10-22, and 5.10-33 of the DEIR concerned the presence of two vent pipes protruding from Bunker 240, and the possibility that they are connected with underground storage tanks (UST) for fuel storage. They are identified on Exhibit 3 of Appendix 15.10 of the DEIR. We have no specific information at this time on the purpose of the vents, or what they are connected to. According to an old Army map in our files, there were three "abandoned tanks" in the vicinity of the bunker, none of which were located in, or next to the bunker. We believe that the two tanks removed by the Coast Guard in 1996, as discussed in the DEIR on pages 5.10-2, 5.10-3, and 5.10-12, were two of these three tanks. Also, the vents could have been connected to USTs mentioned in the DEIR among the remediation projects identified by the "military" as part of site abandonment, i.e., removal of two 500-gallon USTs at Bunker 240 (p. 5.10-2). It also is possible that the vents could have been used for some purpose other than venting fuel storage tanks.

23F

If you have any questions regarding this letter, please call Ms. Carol Meyer of my planning staff at (510) 437-3511.

Sincerely,



R. M. DIEHL

Commander, U. S. Coast Guard  
Assistant Chief, Civil Engineering Division  
By Direction of the Commander

Copy : Commanding Officer, U. S. Coast Guard Integrated Support Command San Pedro  
Commanding Officer, U. S. Coast Guard Civil Engineering Unit Oakland

03/01/01 11:22 FAX 760 431 9824

US FISH AND WILDLIFE

002



U.S. Fish and Wildlife Service  
 Carlsbad Fish and Wildlife Office  
 2730 Loker Avenue, West  
 Carlsbad, California 92008  
 (760) 431-9440  
 FAX (760) 431-5902 + 9618



CA Dept. of Fish & Game  
 4949 Viewridge Avenue  
 San Diego, California 92123-1662  
 (619) 467-4201  
 FAX (619) 467-4235

In Reply Refer To:  
 FWS-LA-755.2

MAR - 1 2001

Joel Rojas  
 Director of Planning, Building and Code Enforcement  
 City of Rancho Palos Verdes  
 30940 Hawthorne Boulevard  
 Rancho Palos Verdes, California 90275-5391

Subject: Alternative 5 of the Rancho Palos Verdes NCCP, Los Angeles County, California

Dear Mr. Rojas:

This letter provides our comments regarding proposed Alternative 5 of the Rancho Palos Verdes Peninsula Natural Communities Conservation Planning (NCCP) Program dated November 22, 2000, and the upcoming Rancho Palos Verdes City (City) Council hearing to adopt a preferred project alternative for analysis and public review. Over the past year the Department of Fish and Game (Department) and U.S. Fish and Wildlife Service (Service), the "Wildlife Agencies," staff from the City of Rancho Palos Verdes (City), and local landowners representatives have met to discuss the development of an alternative that would meet the goals of the NCCP effort and the landowners. As discussed with you over the past few months we continue to have concerns about the proposed "Alternative 5" reserve design. We are particularly concerned with the proposed development within the large blocks of habitat primarily on City Hall property and in the moratorium area near Peacock Flats under this alternative. These concerns are based on our evaluation of the consistency of the alternative with the NCCP Conservation Guidelines and the conservation plan's ability to meet the preserve design tenets/species requirements.

24A

As previously discussed with you, we are concerned with the existing proposals for the York/Long Point and Hon Company projects. The York/Long Point (Destination Resorts) development continues to propose development on the former Marineland site, City Hall, and National Park Service properties, and would impact a highly productive area for the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*, "gnatcatcher"). Hon Company (Palos Verdes Land Holding Company) has proposed a project within the Portuguese Bend landslide moratorium area that would impact the large core habitat area and bisect the remaining habitat.

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We understand that a previously approved project has obtained land use approvals from the City that are necessary to develop the former Marineland site. The Wildlife Agencies maintain that development of the proposed project on the Marineland site would be consistent with NCCP.

24D

Joel Rojas

However, the project by York/Long Point proposes to develop a resort hotel, 9-hole golf course, and associated amenities on the former Marineland site, existing public lands owned by the City, and public lands acquired by the National Park Service with Federal Land and Water Conservation funds. We maintain that their proposal will significantly reduce productive gnatcatcher habitat, particularly on the City Hall land. Though the City had indicated that sage scrub would remain or be revegetated on the property, these areas would become further fragmented by the proposed development. The sage scrub habitat would not be contiguous, would be patchwork of lands surrounding the proposed fairways within the golf course, and unlikely be able to maintain a productive gnatcatcher area. Public lands that support sensitive habitat and species should be considered a priority for being placed into the reserve to maximize conservation benefits and minimize acquisition costs of the NCCP plan. Additionally, the partial loss or fragmentation of City Hall lands would compromise the linkage of the 30-acre mitigation site on Subregion 1 and the Agua Amarga Canyon, another productive gnatcatcher habitat area on the peninsula.

24D

The Lower Filiorum project is also being proposed by York Long Point Associates. This area is a key linkage/connector between the coastal bluffs and Upper Filiorum. A functional connection must be retained through this area. The reserve design now only indicates that a habitat linkage is planned, but linkage criteria are not specified nor are hardlines shown. Alternative 5 also proposes to eliminate more of upper Filiorum that encroaches further into the core habitat areas.

24E

The Hon Company is proposing to develop the golf course and associated amenities within the Portuguese Bend and Peacock Flats areas. The proposed golf course project had not provided required geological studies to verify that it can meet the acceptable safety factor for these activities. Although the project proposes habitat linkages within the golf course, placing large "bubbles of nonhabitat" in the core area of undeveloped land within the landslide is problematic. Although not all of the habitat within the proposed golf course is pristine, it comprises the largest block of sage scrub in the planning area. The current configuration of the golf course significantly impacts the core habitat area and further fragments this area. In addition, the fragments of restored habitat within the golf course likely will not support successful breeding by gnatcatchers. Moreover, these fragments likely will function as habitat for brown-headed cowbirds, which are nest-predators of the gnatcatcher and other sensitive birds. The proposal also significantly increases the amount of urban edge around the reserve lands, that reduces habitat values and increases management needs. Consolidating the golf course footprint, identifying appropriate edge landscaping and specifying management actions, such as cowbird control, also should be included.

24F

The Ocean Trails Golf Course, is located in an ancient landslide area that was certified safe for construction. A 1999 landslide within the golf course raises concerns that a golf course in Portuguese Bend, even if it is able to meet the current landslide safety/risk requirements, may not be stable in the long-term and require additional work that could further reduce habitat acreage.

Land on the west side of Palos Verdes Drive South in the Portuguese Bend area that is currently not proposed for conservation should be reconsidered. The City has chosen not to include these lands in the proposed reserve because of the City's desires to conduct landslide remediation

Joel Rojas

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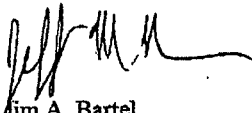
activities associated with the stabilization of the moratorium area and Palos Verdes Drive South. The NCCP can include the area as a reserve and address proposed landslide stabilization as a covered activity in the permit. Following the stabilization activities, the area could be revegetated with native drought tolerant vegetation to augment the coastal bluff reserve.

24F

We appreciate the City coordinating with the Wildlife Agencies, and hope that these comments are helpful in assisting the City with the development of an alternative that balance the goals of the NCCP program with the needs of the City. We continue to be available to work with the City, your consultants, and the various stakeholders to prepare a plan that is consistent with NCCP Conservation Guidelines. We are also available to provide guidance and input on how to reduce impacts to the species we are addressing under this plan and to ensure that proposed alternatives avoid and minimize take of listed species to the maximum extent practicable. Please contact William Tippetts at (619) 467-4212, of the Department or Mary Beth Woulfe at (760) 431-9440, of the Service, if you have any questions or comments concerning this letter.

24G

Sincerely,

  
For Jim A. Bartel  
Assistant Field Supervisor

William E. Tippetts  
Environmental Program Manager

cc: City of Rancho Palos Verdes Council Members  
City Manager, Rancho Palos Verdes (Attn: Les Evans)



U.S. Fish and Wildlife Service  
 Carlsbad Fish and Wildlife Office  
 2730 Loker Avenue, West  
 Carlsbad, California 92008  
 (760) 431-9440  
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CA Dept. of Fish & Game  
 4949 Viewridge Avenue  
 San Diego, California 92123-1662  
 (858) 467-4201  
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APR 09 2001

In Reply Refer To:  
 FWS-LA-1406.1

PLANNING, BUILDING,  
 & CODE ENFORCEMENT

APR 5 2001

David Snow  
 City of Rancho Palos Verdes  
 30940 Hawthorne Boulevard  
 Rancho Palos Verdes, California 90275

Re: Draft Environmental Impact Report for the Long Point Resort Project in the City of  
 Rancho Palos Verdes, Los Angeles County, California (SCH #2000071076)

Dear Mr. Snow:

The California Department of Fish and Game (Department) and U. S. Fish and Wildlife Service (Service), the Wildlife Agencies, have reviewed the Draft Environmental Impact Report (DEIR) dated February 2001, for the proposed Long Point Resort project in the City of Rancho Palos Verdes (City), California. The Wildlife Agencies have reviewed the DEIR with regard to the proposed project's on-site biological values and in the context of regional conservation planning efforts being undertaken in accordance with the Natural Community Conservation Planning (NCCP) Act of 1991. Our comments are based on review of biological resources information presented in the DEIR and supporting technical appendices prepared by RBF Consulting, as well as the Rancho Palos Verdes NCCP Subarea Plan Phase I Summary Report (Phase I Report), long-term ecological research of the area by Jonathan Atwood of Manomet Observatory, and our knowledge of biological resources on the Palos Verdes Peninsula.

The Department is identified as a Trustee Agency pursuant to the California Environmental Quality Act (CEQA) section 15386 and is responsible for the conservation, protection, and management of the State's biological resources. The Department is also responsible, pursuant to the California Endangered Species Act, Fish and Game Code 2050 *et seq.*, for the protection of species listed by the State as endangered or threatened or identified as species of concern and the habitats they require. The Department is also the principal state agency implementing the NCCP Program, which allows regional, habitat-based conservation plans to be developed in concert with participating jurisdictions to aid in the preservation of sensitive biological resources.

The Service's primary mission is to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. Specifically, the Service administers the Endangered Species Act (Act) of 1973, as amended (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*), and provides support to other Federal agencies in accordance with the

25A



provisions of the Fish and Wildlife Coordination Act (48 Stat. 401 as amended, 16 U.S.C. 661 *et seq.*). Section 7 of the Act requires Federal agencies to consult with the Service should it be determined that their actions may affect federally listed threatened or endangered species. Section 9 of the Act prohibits the “take” (e.g., harm, harassment, pursuit, injury, kill) of federally listed wildlife. “Harm” is further defined to include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns including breeding, feeding, or sheltering. Take incidental to otherwise lawful activities can be permitted under the provisions of section 7 (Federal consultations) and section 10 (permits) of the Act, or under the terms of the special rule pursuant to section 4(d) of the Act for the threatened coastal California gnatcatcher (*Polioptila californica californica*, gnatcatcher)[50 CFR § 17.41(b)].

**25A**

The City of Rancho Palos Verdes is currently in the process of developing a Natural Community Conservation Plan and the proposed project will occur within the boundaries of the planning area. The NCCP Act was approved in 1991 to provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development growth (California Fish and Game Code section 2800 *et seq.*). The law provides an alternative to “single-species” conservation via the formulation of regional, natural community-based habitat protection reserves and programs. The first of the NCCP projects in the State has been focused on providing adequate conservation and mitigation for impacts to coastal sage scrub, the preferred plant community of the gnatcatcher.

The proposed project is divided into two areas to the north and south of Palos Verdes Drive South. The 103.5-acre Resort Hotel Area (RHA) is located to the south of Palos Verdes Drive and is the site of the former Marineland aquatic park. The Upper Point Vicente Area (UPVA) consists of 64.9 acres surrounding City Hall. The proposed project includes the development of a resort hotel, nine-hole golf course, and associated facilities.

The project proposes to impact public lands owned by the City and public lands acquired by the National Park Service with Federal Land and Water Conservation funds. Public lands that support sensitive habitat and species should be considered a priority for being placed into the reserve to maximize conservation benefits and minimize acquisition costs of the NCCP plan.

**25B**

According to the DEIR, the proposed project will impact sensitive coastal sage scrub, southern cactus scrub, coastal bluff scrub, and mulefat scrub communities. Federally threatened and endangered species that will or have potential to be impacted by the project include the gnatcatcher, endangered California brown pelican (*Pelecanus occidentalis*), endangered Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*), and the endangered El Segundo blue butterfly (*Euphilotes battoides allyni*). Sensitive species potentially impacted by the proposed project include Cooper’s hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), turkey vulture (*Cathartes aura*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), coastal cactus wren (*Campylorhynchus brunneicapillus couesi*), northern harrier (*Circus cyaneus*), western yellow warbler (*Dendroica petechia brewsteri*), white-tailed kite (*Elanus leucurus*), California horned lark (*Ereophila alpestris actia*), loggerhead shrike (*Lanius ludovicianus*). Several sensitive species of bats may roost in the abandoned structures on the RHA and use the project site for foraging. Sensitive plant species

**25C**

including island green dudleya (*Dudleya virens* ssp. *insularis*), California box-thorn (*Lycium californicum*) and woolly sea-blite (*Suaeda taxifolia*) were observed on the project site, and suitable habitat occurs onsite for others such as the federally endangered Lyon's pentachaeta (*Pentachaeta lyonii*), aphanisma (*Aphanisma blitoides*), south coast saltscale (*Atriplex pacifica*), Catalina mariposa lily (*Calochortus catalinae*), Lewis' evening primrose (*Camissonia lewisii*), Catalina crossosoma (*Crossosoma californicum*), and Santa Catalina Island desert-thorn (*Lycium brevipes* var. *hassei*).

**25C**

The Wildlife Agencies offer the following comments concerning this project:

1. Implementation of the proposed project will significantly affect the preparation of the City's Subarea Plan. According to the Phase I Report, "(t)he goal of the subarea plan is to provide sufficient conservation of habitat in an appropriate configuration such that the target species and other sensitive species will persist in the plan area." According to the DEIR, project surveys conducted in 1998 concluded that 4 pairs of gnatcatchers and 11 pairs of cactus wrens occupied the UPVA site, and the Phase I Report indicates that gnatcatchers and cactus wrens have historically occupied the UPVA. Although the project proposes direct impacts to 4.91 acres of 19.51 acres of scrub habitat on the UPVA site, the alignment would result in fragmentation of the existing habitat and would subject remaining habitat to increased edge effects thereby reducing its long-term viability as breeding habitat for the gnatcatcher. Habitat values of this productive area would be reduced as implementation of the proposed project would result in a patchwork of sage scrub habitat surrounded by golf course fairways.

**25D**

The UPVA also functions as an important habitat linkage between gnatcatcher and cactus wren populations in Agua Amarga Canyon to the north and Portuguese Bend to the east. Years of research have shown that the gnatcatchers occurring on the UPVA site are some of the most productive on the peninsula and may act as a source population supplying juveniles to populate these and other habitat areas. According to the Phase I Report, the western portion of UPVA also supports ocean locoweed (*Astragalus trichopodus* var. *lonchus*), and the site is identified as an area of moderate restoration potential for the Palos Verdes blue butterfly. The gnatcatcher, cactus wren and Palos Verdes blue butterfly are all identified as target species in the Phase I Report, and the UPVA should be identified for conservation in the City's Subarea Plan. Restoration efforts to the west (Subregion 1) and north (Lunada Canyon) of the UPVA further increase the importance of this linkage. Any development proposed within this area should be significantly reduced and configured to retain larger blocks of habitat and preserve connectivity to adjacent native habitats.

**25E****25F**

A golf practice facility, pro-shop, and associated parking lot are proposed for the northwestern portion of UPVA. This area supports chenopod scrub and annual grassland habitats and serves as the northernmost connection on UPVA to other native habitat areas to the north. This area has high restoration potential, and we consider it to be essential to the development of the reserve. We recommend reducing the development emphasis on UPVA by shifting the practice facility and associated improvements to the RHA. Preserved areas should be placed under a conservation easement.

**25G****25H****25I**

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|----|---|------------|
| 2. | As discussed in the DEIR, the proposed project site is within the boundaries of designated gnatcatcher critical habitat (Unit 8; 65 FR 63680). Projects requiring discretionary approval by a federal agency (i.e. National Park Service, U.S. Army Corps of Engineers) that “may affect” constituent elements within designated critical habitat require consultation with the Service.  | <b>25J</b> |
| 3. | The DEIR indicates that a number of rare plants potentially occur onsite and are likely to be impacted by the proposed project. A project may be considered to have a significant effect if it will adversely affect rare species (per the 1999 CEQA Deskbook). A species need not be listed by the State or Federal government for it to be considered by CEQA as “rare” or “endangered,” as long as it meets the criteria for listing. CNPS list 1B plant species such as island green dudleya meet this criteria, and impacts to such species should be regarded as significant. We recommend avoidance and minimization of potential impacts to all such plants onsite, including adequate buffers to ensure long-term protection. Appropriate mitigation, developed in coordination with the recommendations of the Department, should be incorporated into the project for all CNPS list 1B plant species.  | <b>25K</b> |
| 4. | The host plant for the endangered El Segundo blue butterfly ( <i>Euphilotes battoides allyni</i> ) is coast buckwheat ( <i>Eriogonum parvifolium</i> ) not ashy-leaf buckwheat ( <i>Eriogonum cinerium</i> ) as stated in the DEIR. Should coast buckwheat occur on-site, we recommend surveys to determine the status of El Segundo blue butterfly on the property.  | <b>25L</b> |
| 5. | Grading and other alterations to the topography and hydrologic patterns of the site may increase the risk of landslide. The substantial irrigation needs of the proposed golf course will only magnify this risk. Mitigation measures for impacts to habitat due to landslide should be incorporated into the project design.   | <b>25M</b> |
| 6. | According to the DEIR, suitable nesting habitat for peregrine falcon is present along the bluffs in the RHA. Increased lighting and noise during and after project implementation may affect falcons, bats, and other species that roost and/or nest on these bluffs. Pursuant to Section 3511 of the Fish and Game Code, peregrine falcons are a fully protected species and take of individuals is prohibited. Furthermore, avian nests and eggs are protected pursuant to Section 3503 and 3503.5 of the Fish and Game Code, and impacts should be avoided. Potential habitat also occurs on the project site for sensitive bat species such as: pallid bat ( <i>Antrozous pallidus</i> ), pale big-eared bat ( <i>Corynorhinus</i> (=Plecotus) <i>townsendii pallescens</i> ), mastiff bat ( <i>Eumops perotis</i> ), small-footed myotis ( <i>Myotis ciliolabrum</i> ) and Yuma myotis ( <i>Myotis yumanensis</i> ). The project proposes to conduct surveys for nesting raptors 30 days prior to commencement of demolition activities. Preconstruction surveys for nesting birds and bats should be conducted a maximum of seven days before commencement of any construction activities to ensure absence of active nests. If nests are present, the Wildlife Agencies should be notified and construction activities within 500 feet of the nest should be avoided until the young have fledged. | <b>25N</b> |

7. Mitigation measure 5.3-2g (Page 5.3-68 of the DEIR) states that the project will be “modified to avoid any construction/development impact upon coastal bluff scrub and disturbed coastal bluff scrub areas.” However, Table 5.3-4 indicates 0.10 acres of coastal bluff scrub will be impacted on the RHA. Please clarify impact calculations to this sensitive habitat. **25O**
8. According to the DEIR, the project proposes to remove 18.07 acres of annual grassland. This grassland occurs as a mosaic within the coastal sage scrub and therefore provides habitat for gnatcatchers and cactus wrens. Although not considered a sensitive habitat in the DEIR, annual grassland also possesses biological value in that it provides foraging area for raptors. Given the number of sensitive raptor species with potential to use the project site and the suitability of onsite habitats, loss of 18.07 acres should be considered significant, and mitigation should be incorporated into the project. We recommend impacts to annual grassland be mitigated at a minimum 1:1 ratio in an area with long-term conservation potential. **25P**
9. Impacts to mulefat scrub should be avoided. Mitigation for unavoidable impacts should occur in areas of long-term conservation potential and should comply with the State’s no-net-loss of wetlands policies. The Department may require a Lake or Streambed Alteration Agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to the applicant’s commencement of any activity that will divert, obstruct or change the natural flow or the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department’s issuance of a Lake or Streambed Alteration Agreement for a project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The Department, as a responsible agency under CEQA, may consider the local jurisdiction’s (lead agency) Negative Declaration or EIR for the project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the potential impacts to the lake, stream or riparian resources should be identified, and adequate avoidance, mitigation, monitoring and reporting commitments provided for issuance of the agreement. A Streambed Alteration Agreement notification package may be obtained by writing to The California Department of Fish and Game, Environmental Services Division, 4949 Viewridge Avenue, San Diego, CA 92123 or by calling (858) 636-3160. In addition, the applicant may be required to obtain a permit pursuant to Section 404 of the Clean Water Act from the U.S. Army Corps of Engineers. **25Q**
10. It is unclear as to whether fuel modification zones have been incorporated into the project design. Clearing and/or thinning coastal bluff scrub and other sensitive habitats for fuel modification are project-related impacts and will require additional mitigation. **25R**

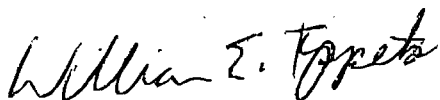
David Snow (FWS-LA-1406.1)

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development project. The Wildlife Agencies have determined that the proposed project would have significant, unmitigated impacts on sensitive biological resources. Specifically, the actions will substantially reduce the habitat of wildlife species, reduce the numbers of endangered, threatened or rare species, conflict with long-term environmental goals identified by the NCCP planning process for the City, and result in impacts that are cumulatively significant in light of past habitat losses and the small amount of remaining habitat to support sensitive species on the Palos Verdes Peninsula. We request that the City not take final certification action until the Wildlife Agencies have had the opportunity to meet with the applicant to address the concerns identified in this letter, including the impacts to the NCCP. If you have any questions or comments please call Warren Wong (Department) at (858) 467- 4249 or Kevin Clark (Service) at (760) 431-9440.

25S

Sincerely,



William E. Tippetts  
Environmental Program Manager  
California Department of Fish and Game



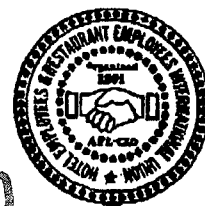
Karen A. Evans  
Acting Assistant Field Supervisor  
U.S. Fish and Wildlife Service

cc: National Park Service, San Francisco  
Pam Emerson, California Coastal Commission  
Robert Lowe, Destination Hotels & Resorts



**Hotel Employees  
and Restaurant Employees  
Union of San Diego**

Office of the Secretary-Treasurer  
JEF L. EATCHEL



Affiliated with...

American Federation of Labor  
State Federation of Labor  
State Culinary Alliance  
San Diego Central Labor Council  
Union Label & Service Trades Council

**RECEIVED**

APR 05 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

4/5/01

By facsimile and U.S. mail

Mr. David Snow, AICP  
Deputy Planning Director  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275  
Facsimile 310/544-5293

Dear Mr. Snow,

In my capacity as a research analyst for the International Hotel Employees Restaurant Employees Union (HERE), I track new hotel development in Southern California, including the environmental impact review process, with an eye towards issues important to hospitality workers as well as residents. I am providing comment to the City of Rancho Palos Verdes (RPV) on the York Long Point DEIR on issues of traffic, transportation and parking. The current analysis of these issues is insufficient and not in compliance with CEQA's requirement that the public have adequate information during the EIR process.

**26A**

Before getting into the specifics of the DEIR, note that my comments are based on HERE's half century of experience in the Southern California hospitality industry as well as my particular knowledge about a property used in the Long Point DEIR as a comparison, the Hotel Del Coronado. The City will note that the Hotel Del Coronado is operated by Destination Hotel and Resorts, the operating company for the Project's developer, Lowe Enterprises. Lowe has another EIR under review with the City of Coronado for a master plan renovation and new construction. Where relevant I will make reference to comments made on that DEIR at a public hearing held February 20, 2001, as well as other relevant Hotel Del Coronado information.

- I. TRAFFIC: Sections 5.12-1, 5.12-2, and 5.12-3 evaluates the Project's impacts and finds that "mitigation measures are recommended to reduce impacts to less than significant levels" (Page 5.12-1). However, there appears to be a fundamental problem in the trip calculations because they do not provide specific or accurate information about traffic generated by employees or employee use of transit and carpooling. The DEIR needs to be revised to provide this information to address what is described below.

A. EMPLOYEE GENERATED TRAFFIC

1. Footnotes to the Trip Generation section refer to varying percentages of "internal hotel use" vs. outside community use for various site features (i.e. golf course, spa, retail, etc.). (Page 5.12-11). It does not distinguish employee from guest traffic within the category of "internal hotel." Outside of the parking discussion (described below), there is no reference within the traffic analysis to the number of employee-generated vehicle trips. The DEIR should be revised to study and include this information. New analysis should be based both on the specifics of employees at the project and refer to *Trip Generation*, published by the Institute of Transportation Engineers, which includes averaged data on employee trips as well as number of rooms.

26A

During the City's Traffic Committee public hearing on the DEIR, the question of where employees would be coming from was raised and could not be answered. HERE represents over 10,000 hotel workers in the LA area and knows where Southern California hospitality workers already live. With the high cost of housing in RPV and other adjacent communities (Rolling Hills Estates, Palos Verdes Estates), it is rare for hotel employees to be residents of this immediate area. Current HERE membership demographics have considerable resident density in areas within easy commuting distance of the Project, including Long Beach and San Pedro, which are to south of the Project, as well as Torrance, Inglewood, Hawthorne, and Lennox, which are north and east of the Project.

It is likely that a new hotel resort in RPV would attract hospitality workers driving and using public transit from these areas. Traffic analysis should be redone to account for the likely impact of commute patterns from these areas. Special attention should be paid to the surface street commute corridor from San Pedro with streets intersecting and leading to Gaffey, as was noted in the Traffic Committee Public Hearing by committee members who referred to the street as "a secret fly-way" from the south into RPV.

2. The DEIR states that the Project "is projected to employ approximately 700 full-time equivalent employees (FTEE). These employees, however, would work separate shifts, with a maximum of approximately 100 actual

26B

employees on site at any one time (with the major exception of major conferences, banquets, and/or meetings" (page 5.12-40). This claim of a "maximum" of only 100 employees on site at a time is inconsistent with the stated purpose of the hotel as a destination resort, which is in fact devoted to servicing "major conferences, banquets, and or meetings." These events are the economic engine of the Project, not "major exceptions." At the Hotel Del Coronado, which is operated by Destination and used a comparison hotel in the DEIR, conferences constitute the majority of room bookings. 100 employees is not a credible average maximum number for a 550-room destination resort hotel.

**26B**

3. In addition to being conceptually flawed, the DEIR's projection of a maximum of 700 employees looks low in comparison to the ratio of employees to room at Destination Hotel and Resorts' Hotel Del Coronado. The Project proposes 550 rooms—with 400 main hotel rooms and 150 multiple keyed casitas (Page 5.12-40)—and says it will employ a maximum of 700 people, a ratio of 1.27 employees per room. The Hotel Del Coronado has 692 rooms and employs a maximum of 1,200 workers, a ratio of 1.73 workers per room.

The Hotel Del Coronado is clearly an older hotel. Older properties generally require more employees in maintenance and housekeeping departments than new hotels. However the Project includes features not offered and staffed at the Hotel Del Coronado, centrally the golf course. The Project also has a much larger volume of rooms in the guesthouse "casita" format, which are more labor intensive for housekeeping staff to clean than regular guestrooms. The City needs to better explain the Project's formula of employees per room in the revision of the DEIR. A larger staff would impact multiple elements in the DEIR analysis, including traffic and parking analyses. New analysis with a higher number of employees could change whether effects would be significant and would need more mitigation.

**26C**

4. It is unclear whether the traffic study trip generation analysis assumes employee travel based on 100 employees at the hotel, vs. a much larger share of the 700 total employees coming and going, 24 hours a day, as is necessary to staff such a hotel. If trip generation was calculated only on the 100 employees, the traffic analysis is seriously flawed and must be redone.

**26D**

5. The DEIR says that there are shift changes during the day, but does not specify how many shift changes in one day are normal. In HERE's experience, there are 3-4 shifts per 24-hour day in a resort hotel, the number of shifts varying by the department. The heaviest shift changes tend to be in the morning and evening. The traffic analysis should be

**26E**



redone to examine traffic flows during projected peak shift changes, both in the morning and evening, when commute traffic is also at its height.

**26E**

#### **B. EMPLOYEE CARPOOLING AND PUBLIC TRANSIT:**

1. The Project DEIR states that LSA analysis "has estimated that approximately 50% of the employees would be transit dependent" (page 5.12-43). It is unclear what impact this will have on existing bus service, whether more service will be required, and from where to where. This need should be considered in revision of the DEIR.

**26F**

2. The City of Rancho Palos Verdes should also consider requiring the developer to provide incentives to employees for carpooling or using public transit. As part of its review of the DEIR for a proposed \$55 million Hotel Del Coronado master plan renovation, the City of Coronado has asked Destination to show what programs they have or will develop to encourage employee carpooling and the use of public transit. Similar programs would undoubtedly benefit Rancho Palos Verdes and the surrounding areas.

**26G**

II. PARKING: Section 5.12-4 "Parking Capacity" states that "the project may result in inadequate parking" but with that "Analysis has concluded that the Project proposes adequate on-site parking" (page 5.12-37). The analysis is inadequate because it fails to specify designated employee parking and public use parking in sufficient detail. The DEIR needs revision to comply with CEQA.

**26H**

#### **A. EMPLOYEE PARKING ISSUES**

1. The DEIR states that, "employee parking would be designated in remote locations on the Project site." It does not make clear just how many spaces will be designated for employees. The revised EIR needs to establish this to ensure adequate parking for employees, guests, and the public.

**26I**

2. The notation that employee parking will be in "remote locations" begs the question of how exactly employees are coming to work. Will their employer expect them to walk from the remote locations? If so, what does this do to the traffic flow within the resort? What will the parking arrangements be for employees who work at the proposed golf course up the hill from the main hotel resort site? Will the employer provide an employee shuttle service from the remote parking areas? If so, what is the impact of such a service? How many trips per day would be needed for this coming and going at shift changes? What level of pollution and noise would be generated? Will the employer purchase shuttles with clean energy sources or will they be burning diesel fuel?

**26J**

3. In my comments on traffic I have discussed the ways in which it is problematic for the DEIR traffic analysis to assume a maximum of 100 employees per shift. This includes the parking analysis, which is also terribly flawed. The DEIR follows its description of conference and banquet events as "exceptions" with the statement that: "The parking supply of 825 spaces would adequately serve both the hotel patronage and employee parking on a regular business day." The DEIR has not adequately or accurately define what constitutes a "regular business day" for its parking or traffic analyses, and what would happen on conference, meeting or banquet days. Analysis must be redone.
4. When looking at what constitutes a "regular business day," analysis can look to other similar resort occupancy rates averaged over the year. The Hotel Del is a comparison hotel for parking analysis in the DEIR. And it is operated by the Project developer's hotel operations company, Destination Hotel and Resorts. Last year the Del had an 81% occupancy rate averaged over the year, which reflected a drop in previous annual rates that stayed at a fairly constant 85-86% until the hotel began renovation construction.

26K

26L

#### B. PUBLIC PARKING:

1. The Project proposes 825 spaces with another 100 designated for public parking. However, the DEIR states that the public parking may be used by the Resort in "special circumstances," i.e. when the hotel is full. Again we have the problem of gauging what will be "special" vs. what will be normal at the hotel. The DEIR speculates that, "These situations mostly likely would occur in the evening hours, when the public parking is available for Hotel use" (page 5.12-40). "The special events discussed above would not occur frequently, and in the event the parking demand was in excess of the 825 spaces, the public parking (100 spaces) could be utilized" (page 5.12-43). The DEIR does recognize that "Use of public parking areas for hotel/golf uses may impact the adequacy for public uses. This impact would be considered significant unless mitigated" (page 5.12-43). But the mitigation proposed is inadequate.

26M

The mitigation proposed is simply to restrict the public parking areas. "Implementation of the specified mitigation restricting the use of public parking areas would reduce this impact to less than a significant level" (page 5.12-43). This is not adequate mitigation because it will basically eliminate public parking when the hotel is full. The evening time frame proposed does not address what happens when the hotel parking lot is full with guests and employees during the day. It is also unclear that the public would not use access to the recreation areas

during the evening, or that the public might not want access to the hotel services in a non-guest capacity.

**26M**

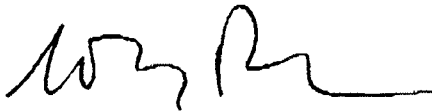
2. In evaluating the public parking issue, the City should be aware of the current Destination Hotel and Resort parking policy at the Hotel Del Coronado, which requires employees to park off-site on days when the hotel is full or during "special events." As a result the employees park on the street, causing a burden for employees who are trying to get to work on time, for the residents who park in front of their homes, and for local businesses.

This issue was discussed at a public hearing on the DEIR for the hotel's renovation this past February. Coronado residents testified that the hotel regularly post signs at the hotel's parking lot entrances, telling employees not to use the hotel lot on heavy days. City Council members described the employee parking issue as a long-standing "sore spot." The City of RPV would do well to ensure this does not happen in its community.

**26N**

In summary, there are a number of issues in the Traffic analysis that must be addressed for impacts to be adequately known and properly mitigated. In reviewing the written public comments submitted prior to the Traffic Committee DEIR public hearing and from attending the hearing itself, it is clear to me that the City and citizens of Rancho Palos Verdes understand the need to thoroughly review the project. I am pleased to be able to contribute to this process.

Sincerely



Dr. Molly Rhodes  
Research Analyst  
Hotel Employees Restaurant Employees Local 30  
121 Juniper Street  
San Diego, CA 92101  
619/233-4391 voice  
619/233-4394 fax  
[drmoll@home.com](mailto:drmoll@home.com) email

Cc: Rancho Palos Verdes City Council and Traffic Committee

# **RESIDENTS' COMMENTS**

**JOHN C. ABSMEIER ARCHITECT A.I.A.**  
**85 rockinghorse road rancho palos verdes calif.**

March 28, 2001

Mayor Lyon, Members of the City Council and Planning Commision  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes CA 90275

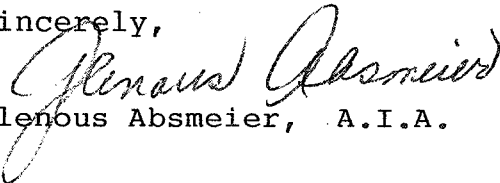
Dear Mayor,

Please consider approving the plan for Long Point. We have been contem-  
plating this beautiful facility long enough.

I believe this resort would be a great asset to the city and community.  
I have only one concern and people have been asking if the city property  
posed by Long Point will, in fact be used for the public. I have assur-  
ed them that this is the plan.

The project will bring jobs to our city and I believe that the Long  
Point Group has offered us a great addition to add to the beautification  
of our city. Please let's have a GO on Long Point.

Sincerely,

  
Glenous Absmeier, A.I.A.

27A

Dear Mayor Lyon  
I am 11 years old and this is my 1st year playing softball. I did not know how many of my friends were already playing softball. I wish we could all play games at the same fields.

I hope that you will find a place for us to have more fields.

28A

Maggie  
Aultman

4204 P U D.R. East  
RPV California  
90275

RECEIVED

BILL and KAY AIKEN  
32724 COASTSIDE DR.  
RANCHO PALOS VERDES  
CA.90275

MAR 13 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

MARCH 7, 2001

To Mayor Lyon, City Council, and Members of the Planning  
Commission

Sirs and Madams,

We the undersigned would like to have it known that we  
support and are very much in favor of the plans for the hotel and  
golf course at Long Point. We are anxious to have this project  
completed and we are in hopes that all of you would agree.

29A

Respectfully,

Bill Aiken

Kay Aiken

Barry Aiken

Thank You

*Bill Aiken*  
*Kay Aiken*  
*Barry Aiken*

RECEIVED

MAR 15 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

6304 Sattes Drive  
Rancho Palos Verdes,  
Calif. 90275  
March 14, 2001

Members of the City Council  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, Calif. 90275

Re: Long Point

Dear Sirs:

I do not object to responsible development of the private property at Long Point. However, I object strongly to any use of city property on the north side of Palos Verdes Drive for this project. This city property should be maintained as natural, open space.

30A

Sincerely,

*Thomas L. Alley*

Thomas L. Alley



April 28, 2001

Mayor Lyon  
Members of the City Council  
And Planning Commission  
30940 Hawthorne Boulevard  
RPV, CA 90275

Dear Mayor Lyon and esteemed Council Members:

We have been members of the Peninsula Community since the 1930's. We support many peninsula organizations including our grandchildren's sports programs.

The Peninsula needs more recreational fields for the ever-expanding younger generation. Girl's softball has specific field dimensions that are near possible to accommodate in our mature community.

The lower Point Vincente property has the available flat area. The Long Point developers will contribute to the development such that our community is able to expand recreational facilities for our children.

Thank you for your consideration.

Sincerely,



Dr. & Mrs. Ralph B. Allman, Jr.  
3282 Via Campesina  
Rancho Palos Verdes, CA 90275

31A

RECEIVED

3/3/2001

MAR 05 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mr. David Snow  
Long Point Project Planner  
Dear Mr. Snow,

This letter is intended to reach all Commissioners on the Planning Commission and all members of the City Council of Rancho Palos Verdes. It concerns the use of City Hall property belonging to Rancho Palos Verdes. The Long Point Project seeking the use of this property for golf course holes is totally unacceptable and the land should not be granted to them.

32A

I am aware of the proposal of SOC II and respectfully request that the City Council accept this plan which is a preferred use of the land. I am also aware of the NCCP Alternative A that protects and preserves and will reserve important habitat. To destroy this area by grading fragile hillsides is a subject I sincerely urge the City Council to consider.

32B

If the City Council does not accept the SOC II plan or the NCCP Alternative A, any other use of the land should come before a vote of the people.

32C

Sincerely,

Dorothea Alpert



A resident of Abalone Cove since 1950

MAR 30 2001

COMMENT NO. 33

3-24-01

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes, Ca  
30940 Hawthorne Blvd  
Rancho Palos Verdes, Ca 90275

RE: The Hong Point Resort

Dear Mayor, Members of the City Council and  
Planning Commissioners:

The purpose of this letter is to let you know  
that I highly recommend the approval of the Hong  
Point Resort, as presented to you.

33A

The reasons are as follows:

- Enhance the currently blighted and old Marineland property eyesore.
- Improve the property near City Hall. My view includes this property, which is barren and unkempt. New public trails, picnic areas and parkland will be an excellent asset for the Community.
- Remove the unsightly telephone and cable utilities' lines and put them underground, greatly improving the environment, beauty with revenues generated to the City.

- Create an area to bike, ride bikes and walk, all of which was taken away and eliminated with the new housing development

33A

In summary, this is a great project for the City and its citizens.

Sincerely

CW Amico

CHARLES W. AMICO

30715 Ruede la Pierre  
RVP, Ca 90275

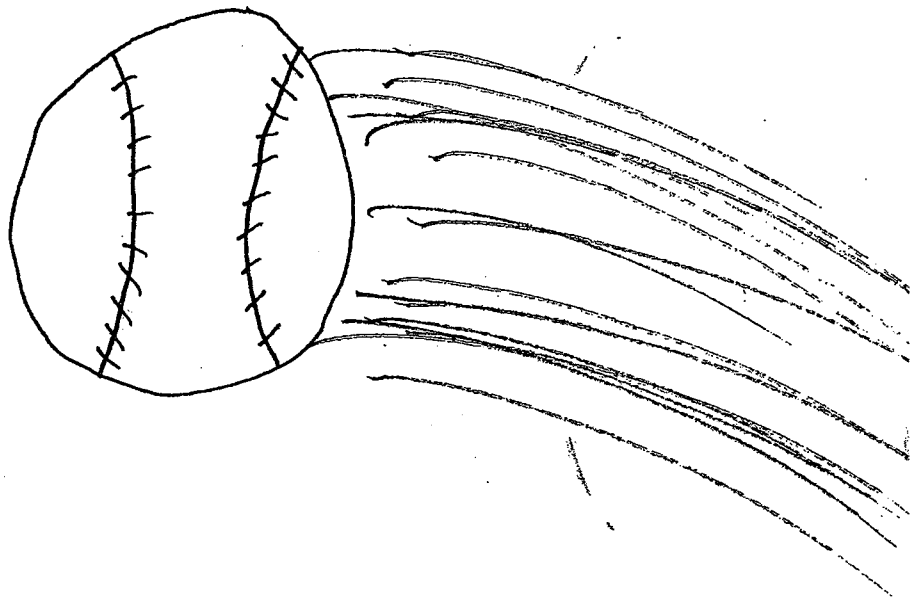
Dear Mayor Lyon,

I am 12 years old and I play softball  
sometimes when I hit the ball it ~~goes~~ goes  
into the trees, so can ~~we~~ we get a bigger  
softball field.

34A

Sincerely,

Micio Anderson  
2 Massongate Dr.



Dear Mayor I you,  
I'm 12 years old I've played 6 years  
of softball. Every year there are more  
new girls playing. We do not have  
enough fields for everyone to  
play together. We hope you will  
help us build new fields.

35A

Sincerely,

Brittney Anderson  
2 Masongate Dr.

MAR 27 2001

Todd P. Anderson  
Senior Vice President

3-26 RECEIVED

MAR 30 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

MAYOR LYON,

PLEASE CONSIDER THE  
COMMUNITY NEEDS OF ALL  
YOUR PRESENT AND FUTURE  
CONSTITUENTS.

TODD ANDERSON

P.S. PLEASE VISIT OUR GAMES  
AT THE PEDREGAL/CORNERSTONE  
SCHOOL THIS SATURDAY TO VIEW  
OUR PLIGHT. I WILL BE THERE FROM  
2:00PM THROUGH THE END OF THE DAY.  
MY TEAM (LETTERS ENCLOSED) PLAYS

601 South Figueroa Street, 47th Floor  
Los Angeles, California 90017-5752  
213/627-4700

AT 3:30 PM ON FIELD #3.

36A



MAR 30 2001

**Todd P. Anderson**  
Senior Vice President

March 28, 2001

Ms. Gail Tierney  
Senior Deputy  
County of Los Angeles  
822 Kenneth Hahn Hall of Administration  
Los Angeles, CA 90012

**Re: Lower Point Vicente Softball Field Complex**

Dear Gail:

I have enclosed a site plan with a softball field complex superimposed on the Lower Point Vicente property which is owned by the County. There is strong growing support among the recreation community within Palos Verdes to put such a use on this property which can serve as multi-purpose fields which include soccer fields in the softball outfields as well as areas for Pop Warner Football and Cheerleading among other groups.

There is a diversionary counter movement developing among those people opposed to using City of Rancho Palos Verdes property for golf course holes related to the Long Point Resort development. The diversionary counter movement is proposing recreation facilities on the Upper Point Vicente city owned property. Unfortunately there is not a large enough level area with street access and parking anywhere on the Upper Point Vicente property which could accommodate the necessary complex of fields which create league synergy.

Supervisor Knabe could play an extraordinarily influential role on behalf of the community of families and children in Palos Verdes, if he were to endorse the County property for such recreation fields. The recreation fields, as you know, are consistent with both the City General Plan and Coastal Commission's Specific Plan. Furthermore, the City is very desirous of reopening the site and expanding the Point Vicente Interpretive Center, which is consistent and complimentary with recreational fields and enables the site to once again provide coastal access to the public.

As you are aware, the City of Rancho Palos Verdes is looking into remediation efforts for the lead contamination. The developer of the Long Point Resort has indicated they would contribute to the development of the field complex on property that is currently in a state of overgrown agricultural land.

Please present this opportunity to Supervisor Knabe. I look forward to following up with you in further detail next week.

Sincerely,

A handwritten signature in black ink that reads "Todd P. Anderson". The signature is fluid and cursive, with the first name "Todd" being more prominent.

Todd P. Anderson

cc: Juan Torres  
Marilyn Lyon  
Mike Mohler

Enclosure

37A



**Les Evans, 09:11 AM 3/28/01 -0800, Fwd: Long Point Resort**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 09:11:32 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Resort

Date: Wed, 28 Mar 2001 07:28:21 -0800 (PST)  
From: John Tupper <tuppjohn@yahoo.com>  
Subject: Long Point Resort  
To: CityCouncil@rpv.com  
Cc: longpoint@loweenterprises.com

Dear Mayor, Members of the City Council and Planning Commissioners,

I am contacting you as a resident and President of the Vista Pacifica HOA regarding the proposed resort at Long Point.

I am well aware of the proposal presented to approve Long Point and create a resort on the property. I have attempted to educate myself with all views pertaining to development of the community. To this end, while I do not speak for the Vista Pacifica homeowners, I do speak for my wife and myself to go on record in favor of the development as proposed. This includes the use of the land around city hall to be developed as part of a golf course.

Rancho Palos Verdes deserves the destination conference center and resort. The developer has presented a solid plan for the highest and best use of the land. I believe the resort itself is not in question. Rather, the proposed golf course encroaching on the city land, which is public ly owned, is the issue at hand.

Including a golf course, even if it is only nine holes, is imperative to a successful resort project as proposed. The plans to included amenities not currently available to the public are an exciting asset.

I have been fortunate enough to play golf at Ocean Trails. I have been pleasantly surprised at the use of the public trails and how busy they have been. There is no interference by the golfers, or vice

**38A**

versa. I can speak from personal experience that this wonderful coexistence of land use could not have been possible without careful development.

The same potential holds true with Long Point. This land can be developed to coexist with the developer and the residents of Rancho Palos Verdes. The paths provide access not currently enjoyed by many residents. Creating parks and bluff access is not development for development sake but a harmonious blend of respect for the existing habitat and the key for access to this area by members of the community.

I urge the Mayor and respected members of the City Council to view this proposal based upon the facts, the history of a similar project, Ocean Trails, and the potential benefits to the residents of Rancho Palos Verdes. I trust the voices of the loud and emotional will be heard and the facts will prevail.

Please vote yes for passage of the Long Point Resort.

Respectfully,  
John Tupper  
Cindy Andreotti  
6410 Via Baron  
Rancho Palos Verdes, CA 90275  
310-544-7314

**38A**

MAR 06 2001

March 3, 2001

Glenn Arbuthnot  
28856 Crestridge Rd.  
Rancho Palos Verdes, California 90275

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Joel Rojas:

As a member of the planning commission I ask you to refuse to go along with the incredible damage to the environment that is being proposed by the city.

Almost every day we are given more bad news. Just this morning OPEC has announced that they are going to cut back the sale of oil. We have an electricity emergency. This will not go away quickly. Reputable scientists tell us that we have a global warming problem caused by greenhouse gases. Much of this by automobiles. Our streets and Hawthorne and Crenshaw Blvds. are crowded with automobiles. We have few jobs on the Peninsula so one must drive out each morning and back each night. It would seem to me that a reduction in traffic is a must. Instead of that we are asked to increase our all ready heavy traffic load. It is not safe now and the City is asking for more.

39A

You have under consideration a Hotel which will use more power than at least 150 houses. You also have or will have a plan for a 64 unit apartment building. This will certainly use more power than at least 100 houses. These two high density units are a hazard to everyone. In buildings of this type the common areas such as halls, community rooms and elevators must have some lights on at all times. The elevators also use more power than practically anything in a home.

39B

We have a power crisis and the city proposes a big jump in power consumption. We already have unsafe traffic conditions and the city asks for a vast increase in traffic. The problem is if these two programs are allowed there will be no turning back.

39C

This area was supposed to be low density single family dwellings. We are already well past the low density stage.

We have been here for forty years and voted for the establishment of the City of RPV and paid taxes for this period of time. For the last few years the City has voted for development after development. We are already inundated with traffic. Too much is too much.

39D

Instead of more traffic we should be planting trees. At least 7 trees for every automobile. Automobiles produce carbon dioxide. Trees fix carbon dioxide and transform it into cellulose and oxygen. A most desired reaction.

I ask you to vote against any and all additional over crowding.



Les Evans, 05:19 PM 3/8/01 -0800, Fwd: LONG POINT

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Thu, 08 Mar 2001 17:19:33 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: LONG POINT

From: EBPIGGY@aol.com  
Date: Thu, 8 Mar 2001 19:20:12 EST  
Subject: LONG POINT  
To: CITYCOUNCIL@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10506

DEAR MAYOR, MEMBERS OF THE CITY COUNCIL AND PLANNING COMMISSIONERS.  
LAST NIGHT I WENT TO A PRESENTATION ON THE LONG POINT RESORT. IT LOOKS AND  
SOUND BEAUTIFUL.  
IT WILL ADD SO MUCH TO THE VALUE OF OUR WAY OF LIVE IN RANCHO PALOS VERDES.  
I HAVE LIVED HERE FOR 32 YEARS . WE USED TO HAVE MARINELAND WITH A NICE  
MOTEL AND REST. THERE. IT WAS SOMEWHERE TO TAKE OUT CHILDREN AND OUT OF  
TOWN GUESTS. WE SAW THAT CLOSE. WE SAW GOLDEN COVE BECOME A GHOST TOWN  
WITH NO CLOSE SHOPPING CENTER. EVERY TIME WE THINK THINGS WILL IMPROVE  
NOTHING GETS APPROVED AND THE PEOPLE RUN OUT OF MONEY.  
PLEASE DONT LET THIS HAPPEN THIS TIME. I AM SURE THE SAME VOCAL GROUP WHO  
OPPOSE EVERYTHING WILL BE OUT IN FULL FORCE. I NEVER BOTHER TO WRITE BUT I  
REALLY FEEL THIS WILL IMPROVE OUT CITY AND WAY OF LIFE.  
THANKS FOR YOUR TIME. EDITH BALOG(310-377-9430

40A

RECEIVED

APR 04 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

**Bernard Barbeito**  
26637 Fond du Lac Road  
Rancho Palos Verdes, CA 90275  
Home Phone 373-2704  
Email bato9@yahoo.com

April 03, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Mayor, Members of the City Council and Planning Commissioners:

Re: THE LONG POINT RESORT

I believe the benefits of the Long Point Resort project as is now being proposed, including the use of city-owned property for the golf course, are far greater than the disadvantages.  
I SUPPORT THE PROJECT.

The tax revenues generated could be used to eliminate the utility tax rather than the increase in dollar amount we are now facing as utility costs increase. In addition, walking the proposed trails seems more appealing than hiking through the present remnants of buildings and parking lots.

Respectfully,

*Bernard Barbeito*

41A

## **COMMENT NO. 42**

THIS LETTER WAS A DUPLICATE. THIS PAGE INTENTIONALLY LEFT BLANK.

**Les Evans, 03:03 PM 3/28/01 -0800, Fwd: Long Point Resort**

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 15:03:03 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Resort

X-Mailer: Microsoft Outlook Express Macintosh Edition - 4.5 (0410)  
Date: Wed, 28 Mar 2001 14:55:01 -0800  
Subject: Long Point Resort  
From: "Frank A. Bescoby" <f.bescoby@worldnet.att.net>  
To: CityCouncil@rpv.com  
CC: Soc2steering@aol.com

Mayor Lyon, Members of City Council and Planning Commission, City of Rancho Palos Verdes,  
30940 Hawthorne Blvd., Rancho Palos Verdes, CA 90275

Dear Mayor, Members of the City Council and Planning Commissioners

Re: Long Point Resort

Please use your influence to preserve RPV Pt Vicente Park land as open space for all its citizens to enjoy. It should be developed according to the SOC II plan which would include tennis courts, open space for hiking and equestrian trails, preservation of natural habitat for science classes to study and explore, handicapped and senior citizen parking and picnic areas, benches and viewpoints for everyone to enjoy our beautiful California coastline. Other flatlands could be used for soccer and softball fields, and possibly an equestrian riding ring for the pleasure and safety of our children. This plan would serve all citizens of RPV and not only those interested in golf.

Long Point Resort Hotel and Facility must be developed on the Marineland site according to the previous Federal approved plan. Hotel guests would have easy access to nearby Los Verdes, Ocean Trails, and Harbor Golf and Practice Ranges. Another golf course is being considered at the previous city dump facility located between Hawthorne, Crenshaw, and P V North Blvds. A shuttle bus would provide easy access to these facilities. Point Vicente Park trails and picnic area would also be an asset for guests who prefer hiking to golf. The Long Point Resort plan allows a small percentage of land for trails and open space and most of the trails are along streets, the upper area reserved for golf carts.

The proposed hotel and its amenities would provide revenue and jobs for RPV but it must be developed without RPV federally granted land. I trust you will SAVE our OPEN SPACE. Thank you!

Sincerely, Ruth Bescoby, 19 Surrey Lane, RPV FAX 377-4151, email f.bescoby@worldnet.att.net  
310 377- 6645

**43A**

**Les Evans, 03:27 PM 3/28/01 -0800, Fwd: <no subject>**

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 15:27:12 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: <no subject>

X-Mailer: Microsoft Outlook Express Macintosh Edition - 4.5 (0410)  
Date: Wed, 28 Mar 2001 13:52:31 -0800  
Subject: <no subject>  
From: "Frank A. Bescoby" <f.bescoby@worldnet.att.net>  
To: CityCouncil@rpv.com  
CC: Soc2steering@aol.com

Mayor Lyon, Members of the City Council and Planning Commission, City of Rancho Palos Verdes

30940 Hawthorne Blvd., Rancho Palos Verdes, CA 90275  
Re: The Long Point Resort

Dear Mayor, Members of the City Council and Planning Commissioners:

Please use your influence, as our RPV elected officials, to preserve RPV Pt Vincente land and upper park land for open space for all its citizens to enjoy. It should be developed according to the plan presented by SOC II. Under no circumstances should this federally donated RPV land be developed into another golf course by Long Point Resorts. Their hotel facility must exclude RPV land and be developed on the Marineland site as previously approved. Golf facilities are already available at Ocean Trails and Los Verdes Golf Courses and Harbor College Golf and Practice Range Facility. Another golf course is being proposed on the former city dump property at Crenshaw and PVNorth Blvds. A shuttle bus could provide easy access to these facilities for hotel guests.

The SOC II plan will include tennis courts, open space for hiking and equestrian trails, natural habitat for science classes to study and explore, handicapped and senior citizen access for parking and picnic areas, and benches and viewpoints for everyone to enjoy our beautiful California Coastline. Other flat area could be used for soccer and softball fields, and possibly an equestrian ring for the practice, pleasure and safety of our children. You must agree that another golf course is not the best use of this land. If you look at the Long Point Resort proposal, you will find a small percentage of land given for trails, natural habitat, and viewpoints. A new hotel will bring revenue and jobs to our city and most citizens welcome it but do not take our parkland.

Sincerely, Ruth Bescoby, 19 Surrey Lane, RPV FAX 377-4151, email f.bescoby@worldnet.att.net  
310-377-6645

**44A**



FEB 13 2001

Feb. 12, 2001

To: Lee Byrd  
Mayor Pro Tempore  
RPV City Council  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, VA 90275

CC: Marilyn Lyon, Councilwoman  
Barbara Ferraro, Councilwoman  
John S. McTaggart, Councilman  
Douglas Stern, Councilman

We would like to add our voices in opposition to the proposed extension of the Long Point Resort project onto the publicly-owned land surrounding the RPV City Hall. This open land is unique and should either be left as it is or perhaps used as a natural park land with improved accessibility. We are longtime residents of the Point Vicente area and have witnessed the gradual erosion of our open spaces over the years. The semi-rural ambiance, which drew us all to this peninsula, is rapidly disappearing. We do not need a golf course straddling P.V. Drive. We entrust the City Council to preserve as much of our open space as possible. Giving-in to a developer, who only comes here "to make a buck and leave" is a betrayal of the people who make their home here in the community. Let the Long Point people confine their project to their own property! Once our ever-decreasing open spaces are gone, they're gone forever!

45A

Respectfully,

Mr. and Mrs. Kermit Olson

Mr and Mrs Kermit Olson  
30625 Rue Langlois  
Rancho Palos Verdes

Dr. & Mrs. Ron Blackwelder

Dr and Mrs Ron Blackwelder  
30531 Rue Langlois  
Rancho Palos Verdes

**Les Evans, 09:10 AM 3/28/01 -0800, Fwd: 4/3/2001 City Council Agenda Item RE: Upper Pt. Vicente**

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 09:10:51 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: 4/3/2001 City Council Agenda Item RE: Upper Pt. Vicente Park

Date: Tue, 27 Mar 2001 23:25:21 -0800  
From: Meredith Bloss <bloss@home.com>  
Reply-To: blossom@home.com  
Organization: @Home Network  
X-Mailer: Mozilla 4.61C-CCK-MCD AtHome0407 (Macintosh; U; PPC)  
X-Accept-Language: en,pdf  
To: CityCouncil@RPV.com  
Subject: 4/3/2001 City Council Agenda Item RE: Upper Pt. Vicente Park

To the Rancho Palos Verdes City Council Members:

This comment is regarding the future use of city-owned land known as Upper Pt. Vicente Park and City Hall.

My husband and I are fifteen-year residents of Rancho Palos Verdes and are raising three children here. We prefer to see publicly owned land kept undeveloped.

If development occurs, we prefer to see the least amount of development possible. The following uses are desirable and would be a benefit to the community:

1. A public park for families and young children
2. Playing fields for our many sports teams
3. A small overnight camping area for scout troops

We especially do not want to see any part of city land used to enhance a commercial venture. We do not believe that promises of city revenue, however large, can compensate for the loss of land. A golf course is not open land.

Regarding the proposed Long Point development and its stated need for city land, it is our opinion that the proposal is likely too massive and ambitious if it requires the addition of city land. A smaller development which would not encroach on public land is all that should be allowed, and if a smaller development is not economically feasible, then we are better off without it. Please take plenty of time to address this issue and don't be pressured to accommodate a developer's schedule.

We appreciate the opportunity to express our opinion regarding this agenda item.

**46A**

Walter and Meredith Bloss  
27930 Beechgate Drive  
Rancho Palos Verdes

March 26, 2001

**RECEIVED**

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
80940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

MAR 28 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mayor, Members of the City Council and  
Planning Commission:

Re: Long Point Resort

My family and I have been residents of Rancho Palos Verdes for over 30 years.

We strongly support the Long Point Resort. We feel that it will be a beautiful improvement to the City. This improvement will provide needed tax revenue from the development and from increased property values as the present homes change ownership. We can not see any negatives to this much awaited development.

**47A**

Sincerely,

Mr. & Mrs. Nicholas Brajevich  
29666 Highpoint Road  
Rancho Palos Verdes, CA 90275

e-mail nbrajevich@aol.com

**David Brunone, 08:11 AM 2/12/01 -0800, No Subject**

---

From: David Brunone <David.Brunone@trw.com>  
To: CityCouncil@RPV.com  
Subject:  
Date: Mon, 12 Feb 2001 08:11:49 -0800  
X-Mailer: Internet Mail Service (5.5.2650.21)

I favor soc-II also. Leave it open. There is enough development on the hill.

**48A**

Les Evans, 01:29 PM 3/28/01 -0800, Fwd: FW: Use of city hall and upper point vicente park property

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 13:29:34 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: FW: Use of city hall and upper point vicente park property

From: David Brunone <David.Brunone@trw.com>  
To: CityCouncil@RPV.com  
Subject: FW: Use of city hall and upper point vicente park property  
Date: Wed, 28 Mar 2001 11:59:38 -0800  
X-Mailer: Internet Mail Service (5.5.2650.21)

Dear Mayor Lyon and city councilmembers-

We would request that you seriously consider the alternative recreational uses for the city land in the upper Point Vicente park area. The nice flat area would be a great place to create a recreational sports complex for general playground activities. This would allow the general population the ability to enjoy the public property in the way the original city founders envisioned. Coupled with the educational trails and scenic vistas proposed by the SOC2 committee, you could really create a wonderful active and passive recreation area.

**49A**

Thank you for your consideration.  
Dave Brunone  
Marshan Brunone

billholly, 12:54 AM 3/10/01 -0800, Long Point letters

---

From: "billholly" <billholly@msn.com>  
To: <planning@rpv.com>  
Subject: Long Point letters  
Date: Sat, 10 Mar 2001 00:54:20 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2615.200  
X-OriginalArrivalTime: 10 Mar 2001 08:53:13.0977 (UTC) FILETIME=[8A9A3690:01C0A93F]

Dear Chairman Lyon,

I am writing to you out of concern for the fate of the Upper Point Vicente Park property. This is precious land that was deeded to the city by the Department of the Interior to for the use of the general public. It should be clear that "general public" refers to the people of the community, and not a for-profit development company. As a member of the Planning Commission you have the awesome task of analyzing the Draft Environmental Impact Report, and the grave responsibility of considering the alternative proposals and providing our city council with wise counsel. It is important to the people in our community today, and to future generations that this land is developed in a manner consistent with the city's general plan, and fulfilling the intent of the federal government when the land was deeded to the city. Allowing any developer to use public land for private profit is not appropriate use of our public land.

50A

The former Marineland site was purchased with approved plans for a hotel, casitas, and a nine-hole golf course. Destination Points Resorts should be encouraged to proceed to develop this spectacular site according to the original approved plans. Over the years of ever-changing proposals, presented, and rumored, by the developers, the people of the peninsula were told that the project was not financially viable unless it could be developed according to the "plan of the moment." We heard that nothing short of a full eighteen-hole golf course would be acceptable to the developers. Then we were told that a nine-hole golf course would be okay, so long as part of it was located on public land. When proposing to use our public land the developers added more structures on their property, among them timeshares they call "villas." Let's get this behemoth tamed back to its original and appropriate and approved design. Let's especially keep it contained on its own property.

It is particularly disturbing that a "golf academy," euphemism for driving range, is proposed to be located on public land. The developers have repeatedly assured citizens of the community that they would never put up any lights, or fences, or nets, and that only attractive landscaping would surround this "golf academy." Yet, according to Mr. Mohler, spokesperson for the developers, this driving range is proposed to be located, "200 feet," from the Villa Capri homes. This is about sixty-seven yards, which assures errant golf balls will be hit into this residential area, doing what golf balls do. Does this mean that the city would be left to assume this problem and its liabilities?

50B

Mayor Lyon mentioned at the March 6<sup>th</sup> city council meeting that she was receiving calls requesting more athletic field sites. The flat land around city hall could accommodate several fields, while the slopes could be developed using ideas in the alternative proposal submitted to the city council by Jim Knight at the January 16<sup>th</sup> city council meeting. This would provide more playing fields for our youth, a healthy ecological region for the animals and plants we want to protect and nurture, and places for all the people to walk and enjoy the beautiful vistas; all the people, not just golfing hotel guests. Therefore, I urge you to reject the Long Point proposal, and recommend that the Parks and Recreation Department develop a plan for the people of the peninsula, not a developer.

50C

I'm confident that the wisdom of the Planning Commission, and the Finance Advisory Committee, and our Rancho Palos Verdes City Council will allow Upper Point Vicente Park to be developed for the benefit of the people. We look forward to welcoming Destination Points Resort complex to Rancho Palos Verdes...on their own land!

A heartfelt thank you to you for the service you are giving to our community. Please know your work is appreciated. Hope to see you at the "Walk-About" at Point Vicente Park on the 17<sup>th</sup> of March.

Sincerely,

Holly Cain

52 Avenida Corona

Rancho Palos Verdes

CA 90275

e-mail:billholly@msn.com

NOTE: THIS letter was sent to each Planning Commissioner INDIVIDUALLY, However, to reduce extra copies only one copy is included in the Environmental Documentation



To the Chairman and members of the Rancho Palos Verdes Planning Commission,

Comparing the proposals for the development of Upper Point Vicente Park presented by Destination Development Corporation and Save Our Coastline II will show that the benefit to the people of Rancho Palos is best served with the implementation of the SOC II plan.

Section 4-15 of the Draft Environmental Impact Report indicates that only 2.8 acres of Upper Point Vicente Park would be used for passive park land, trails, view points, and parking using the developers proposal. Of these 2.8 acres, 0.6 would be used for parking, leaving only 2.2 acres that the proposal divides into three tiny parcels called parks. In the Soc II plan all of the 68 acres of Upper Point Vicente Park will remain open to the public as trails, viewpoints, picnic areas, and natural habitat. The developers' are proposing to take 68 acres of our parkland, and give us back 2.8 acres.

Some of the most spectacular views on the peninsula can presently be enjoyed from the trails that follow the rim around Point Vicente Park overlooking the ocean. These trails will remain, and be improved under the Soc II plan. Under the developers' proposal these trails we now enjoy would become golf cart paths, and the public would be denied access from sunrise to dark.

There is a need for more athletic fields for the youth of our community. The Soc II plan can easily be adapted to provide space for soccer fields, baseball fields, and tennis courts. The developers' proposal would forever make this space unavailable for athletic facilities for our community.

The developer likes to boast about the planned trails along the ocean bluffs. These trails are in the plan because the Rancho Palos Verdes Specific Coastal Plan mandates them. I would like to commend the planning commission and our city council for this requirement, and I hope that you make sure the area reserved for bluff trails is wide enough. In the drawing it appears that the space between the proposed West Casita Village, the resort bungalows and pool, and the East Casita Village is much too small, making this more a walk through the resort than a walk along the bluffs. A Lookout Point Bar is shown on the ocean side of the coastal bluff trail, and the DEIR says it would be renovated. I don't think people who choose to walk the ocean bluff trail want to have a bar in the middle of the trail.

Please recommend that the Parks and Recreation Department work with the Soc II plan to make Point Vicente Park all that it can and should be, and a place where we will all be proud to have our city hall located.

Holly Cain  
52 Avenida Corona  
Rancho Palos Verdes  
CA 90275

Submitted at 3.13.01  
PC meeting

51A

**Long Point**

---

To: davids@rpv.com  
Subject: Fwd: Long Point Development

From: CANanC@aol.com  
Date: Mon, 12 Feb 2001 19:12:54 EST  
Subject: Long Point Development  
To: CityCouncil@rpv.com  
X-Mailer: AOL 5.0 for Mac sub 28

I favor the position of SOC in developing the Long Point area. I am sure the developer can have a profitable venture with a 9 whole golf course.

**52A**

**RECEIVED**

FEB 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, Ca 90275

Faxed 544-5291

3-29-01

## **Please Support The Long Point Resort Project**



**Do the what is best for the MAJORITY**

**PLEASE CONSIDER**

**The MAJORITY will enjoy 5 new parks and scenic viewpoints.**

**The MAJORITY will enjoy over 11 miles of hiking and biking trails.**

**The MAJORITY including the handicap will enjoy Costal Access, some will fish, picnic, whale watch and tide pool browse.**

**The MAJORITY will have use of a golf course, practice facility, much needed restaurants and world-class resort, where the community can hold events for our local schools, and fundraisers.**

**The MAJORITY will benefit from planned, reasonable, wildlife and native plant protection.**

53A

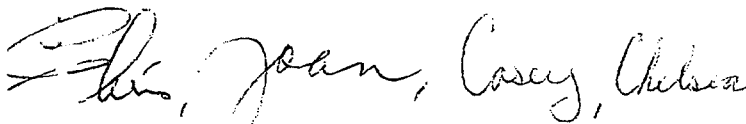
**And finally**

**The MAJORITY will benefit with over FOUR MILLION DOLLARS per year in city revenue.**

**Again, please do what is best for the MAJORITY. Resist special interest groups who think only of themselves.**

**SUPPORT THE LONG POINT RESORT.**

**Respectfully submitted,  
The Carbonel Family,**



**Chris, Joan, Casey, and Chelsea.  
10202 Avenida Selecta,  
Rancho Palos Verdes, Ca. 90275.**

## KULIK, GOTTESMAN &amp; MOUTON, LLP

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April 6, 2001

File No. 2879.0001

**VIA PERSONAL DELIVERY, FACSIMILE, AND EMAIL**

City Council  
 Planning Commission  
 c/o Mr. Dave Snow, AICP  
 City of Rancho Palos Verdes  
 30940 Hawthorne Boulevard  
 Rancho Palos Verdes, California 90275

**RECEIVED**

APR 06 2001

PLANNING, BUILDING,  
 & CODE ENFORCEMENT

*Re: Comments to Draft Environmental Impact Report for the Proposed Long Point  
 Resort Project*

Members of the Rancho Palos Verdes City Council and Planning Commission:

The undersigned represents Save Our Coastline II ("SOC II") and its membership. The purpose of this letter is to comment on the Draft Environmental Impact Report for the Long Point Resort Project ("DEIR") as it relates to all Conditional Use Permits and other applications to develop the land known as the Upper Point Vicente Area ("UPVA"). The comments contained in this document are in addition to, rather than inclusive of, written and verbal comments on the DEIR by individual SOC II members and other interested parties. The contents of this letter are not exhaustive of all possible deficiencies in the DEIR or the planning process, nor is this letter intended to waive any rights or remedies, all of which are hereby expressly reserved.

As described below, The DEIR does not provide a basis to evaluate certain key environmental impacts. The DEIR either fails to raise certain issues or is conclusory in its analysis of significant environmental impacts which it does raise. If the City were to base a decision on the DEIR as it is currently written, it would be basing its decision on insubstantial evidence.

Further, the citizens of Rancho Palos Verdes ("RPV") have a fundamental, vested right in preserving the UPVA property for truly "public" use – as it has remained for over two decades – as opposed to losing the public use of the property to the proposed private golf course. Regardless of its characterization, the proposed course is not a public use of the land as contemplated in the relevant deed(s) to the property.

This letter includes some comments that have been previously raised at public hearings before the RPV City Council and Planning Commission, or various City committees and in

**54A**

# KULIK, GOTTESMAN & MOUTON, LLP

RPV City Council

RPV Planning Commission

April 6, 2001

Page 2

written correspondence to both agencies. It is intended to comply with provisions of California Government Code section 65009, et seq. and applicable provisions of the California Environmental Quality Act ("CEQA").

54A

References are intended to track the organization of the DEIR by section.

## 5.1 AESTHETICS/LIGHT AND GLARE

The DEIR fails to consider the impact of necessary golf safety fences on "aesthetics/light and glare." The DEIR fails to discuss the impact of the safety fences that will surely be required to protect adjoining properties and people on those properties, including Palos Verdes Drive West. The report merely states that such fences are not "proposed." SOC-II asserts that the fences will be necessary in order to avoid negligent operation of the course. These high fences would most likely block the views of neighboring residents and thus conflict with the spirit, if not the letter, of RPV's view ordinance, which recognizes RPV property owners have a legally protected interest in their views. Generally, the safety fences will significantly alter the "open space" character of the area and negatively impact the aesthetic quality of the property and surrounding properties. The failure of the DEIR to consider this impact appears to be a deliberate attempt to preclude informed decision making and informed public participation.

54B

### 5.1-2 "Visual character"

The DEIR does not adequately describe or show the anticipated look of the existing property after the grading and development is completed under the various proposed alternatives. Without a sense of the overall look of the proposed finished project for each alternative, there is insufficient evidence upon which to base a decision regarding the developments impact on "visual character." The DEIR is not sufficiently informative with respect to the probable look of UPVA should any one of the proposed alternatives reach completion. The drafters of the DEIR have demonstrated their ability to generate "photo simulations." Such simulations should be included for each alternative. Moreover, this section states that the possible permanent degradation of the existing visual character is not a significant impact and therefore no mitigation is required. SOC-II contends that such an impact is significant and does require a statement of mitigation or a statement that no mitigation is possible.

54C

### 5.1-3 "Rancho Palos Verdes General Plan"

Since the proposed development would require the city to amend the General Plan, this suggests that the development is not consistent with the vision for the City currently contemplated. That this development necessitates a change to the General Plan is indeed a significant impact. The DEIR should state whether any mitigation measures can be achieved –

54D

# KULIK, GOTTESMAN & MOUTON, LLP

RPV City Council

RPV Planning Commission

April 6, 2001

Page 3

for example – is there a way to accomplish this development without changing the General Plan? If no mitigation measures are possible, the DEIR should state that fact.

54D

## 5.1-6 “Cumulative Impacts”

SOC-II asserts that the treatment of the cumulative effects of the project is conclusory and thwarts an opportunity for informed public input. The summary states that project development may result in greater urbanization. For a city founded on the principles that RPV was founded upon, and that are expressed in the existing General Plan, “greater urbanization” is a significant impact and mitigation measures must be discussed or a statement that no mitigation is possible is required. There is no discussion of the way in which all of the rampant development in RPV (Ocean Trails, Oceanfront, etc.) of late fits in with the General Plan or the cumulative impact on natural resources. For example, there is no mention of the fact that the land directly across Palos Verdes Drive West from the UPVA was recently developed (Oceanfront) and many of the species situated on that may have been displaced to the UPVA. To what extent was wildlife and vegetation displaced or destroyed on the Oceanfront property and to what extent is this part of the cumulative impact of the proposed development of UPVA? This and other cumulative impacts must be fully addressed in the DEIR.

54E

## 5.3 BIOLOGICAL RESOURCES

### 5.3-3 “Wildlife Movement”

The DEIR states that the project may interfere with movement of a native resident or migratory wildlife species. It states that “analysis” has concluded that the impacts are less than significant, and therefore mitigation is not required. While federal and state environmental agencies are in a better position than the membership of SOC-II to comment on this section, for the record SOC-II submits that the UPVA is a critical part of a migratory corridor, much of which has recently been developed (Ocean Trails, Oceanfront, etc.) and that the DEIR improperly concludes that the impact on wildlife movement is insignificant. Mitigation measures should be addressed or the DEIR should state that no mitigation measures are possible.

54F

### 5.3-5 “Cumulative Impacts”

This section fails to consider the cumulative impact on biological resources of the heavy coastal development of late in RPV and is therefore conclusory.

54G

## 5.4 CULTURAL RESOURCES

SOC-II submits that part of the recent culture of the Palos Verdes Peninsula, and in particular, RPV, consists of a commitment to preserving open space and natural coastal habitats.

54H

# KULIK, GOTTESMAN & MOUTON, LLP

RPV City Council

RPV Planning Commission

April 6, 2001

Page 4

The proposed development is inconsistent with this cultural emphasis. Given the serious impacts referenced to Archaeological/Historical resources (such as demolition of the Ishibashi Farmhouse Complex) and the impacts on Paleontological resources, to simply state that no mitigation measures are required for the cumulative impact is conclusory. The DEIR states that resources are evaluated on a "Project-by-Project" basis. This thwarts public consideration and input into the overall cumulative impact of the loss of cultural resources.

54H

## 5.5 GEOLOGY, SOILS AND SEISMICITY

This section is conclusory as to the possibility of landslides. It also states that *additional drilling would be necessary to further evaluate the presence or absence of [a] suspected landslide.* (5.5-16,17) Certainly, no project could be approved before this drilling was in fact accomplished and its results considered.

54I

## 5.6 HYDROLOGY AND DRAINAGE

This section does not adequately address the chemical contaminants in the runoff which will flow from the proposed golf course. Water runoff mixed with chemicals (fertilizer, pesticides, etc.) must go somewhere, either seeping into the ground or into the ocean. Even though the California Coastal Commission has "jurisdiction" generally over the land to the ocean side of Palos Verdes Drive, the runoff makes the Coastal Commission an interested party and it should have an opportunity to comment specifically on this aspect of the DEIR.

54J

## 5.7 LAND USE AND RELEVANT PLANNING

5.7-2,3,5,6

The proposed development conflicts with the General Plan, the Coastal Specific Plan, the Program of Utilization that the federal government originally relied upon when it deeded the property to the City, and the relevant deed(s) themselves. These are extremely significant impacts, yet rather than suggesting any true "mitigation" measures, the DEIR simply proposes changing the General Plan and negotiating with the federal government to change the program of utilization. In short, instead of mitigating against the effect of an inconsistent General Plan, the DEIR simply recommends ignoring its provisions by changing it. The cumulative impact of these radical departures from existing use of the UPVA and long-standing land use philosophy as expressed in the General Plan, Coastal Specific Plan, Program of Utilization and relevant deed(s) must be squarely and honestly addressed in the EIR. The EIR should recognize this fact as significant and state mitigation measures or admit that none are available.

54K



# KULIK, GOTTESMAN & MOUTON, LLP

RPV City Council

RPV Planning Commission

April 6, 2001

Page 5

## 5.7-4 "Development Code/Zoning Ordinance"

SOC-II has not had the opportunity to fully analyze the zoning implications of the proposed development, but submits for the record that the proposed development may infringe upon the common law protections against public and private nuisance enjoyed by the landowners immediately adjacent to the UPVA or violate certain zoning ordinances, as applicable. SOC-II encourages the City to "doublecheck" zoning ordinances to make certain that the proposed development of the UPVA is, in fact, compliant as stated by the DEIR. SOC-II reserves the right to supplement the record on this point after further legal analysis. However, SOC-II asserts that raising this concern to this level of detail is sufficient to preserve its rights to a later challenge on this issue.

54L

## 5.9 NOISE

There is no discussion here of the effect of fairway golfing or driving range activities on the residents of Villa Capri who will undoubtedly hear golfing activities beginning at dawn every morning and, in particular, on Saturdays and Sundays. The noise of electric carts, the noise of clubs striking golf balls, and the noise of talking golfers all will impact the Villa Capri homeowners' right to quiet enjoyment of their property and will likely constitute an actionable nuisance, at least for those residents closest to the proposed course/driving range.

54M

## 5.10 PUBLIC HEALTH/SAFETY

The analysis of the golf ball hazards is inadequate under each alternative which includes golf on the UPVA. There is insufficient evidence to allow a reader of the DEIR to understand how the developer intends to mitigate the hazards presented by errant golf balls. The failure to discuss needed safety fences has been discussed above.

54N

## OTHER ISSUES

While time does not permit a thorough analysis of the following issues, SOC-II submits that each of the following impacts claimed in the DEIR to be "less than significant" are indeed significant, and that for each of these impacts, mitigation measures must be evaluated or the the EIR must state that no mitigation is possible:

54O

## 5.12 TRAFFIC AND CIRULATION

Several key intersections have not been analyzed for the long term impact of increased traffic.

# KULIK, GOTTESMAN & MOUTON, LLP

RPV City Council

RPV Planning Commission

April 6, 2001

Page 6

The DEIR does not consider the effects of the proposed tunnel under Palos Verdes Drive West in a manner that allows for full public input or comment. The impact of this proposed tunnel is not made clear in the DEIR.

54O

## 5.13 RECREATION

5.13-3,4,6 The proposed trail plan is vastly inferior to the existing trail plan and to state in these sections that no mitigation of the conflict with the General Plan, the Coastal Specific Plan, the Palos Verdes Conceptual Trails Plan, and the Palos Verdes Conceptual Bikeways Plan is necessary, is plainly wrong. Mitigation must be discussed, or the EIR must state that no mitigation is possible.

54P

## DEIR'S DISCUSSION OF PROJECT ALTERNATIVES

This issue has been raised by individual SOC-II members in some detail and will not be repeated here. However, this letter incorporates by reference the comments of George Gleghorn in his letter of March 13, 2001 relating to inadequate analysis of alternatives. It is worth noting that there is no alternative proposed that would place the first tee and the starter on the UPVA property. Failure to consider such an alternative is inconsistent with prior administrative opinions from federal agencies. SOC-II disputes that even a resort managed course with the starter on the *public* land complies with the restrictive covenants in the relevant deeds, however, the failure to include this alternative at all highlights the extent to which the developer has controlled the DEIR process. Allowing the starter on the public land would not achieve the developers chief objective – to serve resort guests. SOC-II submits that while this alternative is not in compliance with restrictive covenants and other limitations, it must be considered. It is also worth noting that none of the alternatives contemplate the developers' use only of its private property – all alternatives include annexing public land, save for the no project alternative.

54Q

The foregoing is not intended to be a full recitation of the facts or of applicable legal principles. This letter is not intended to waive any rights, remedies or defenses of the membership of SOC-II, all of which are hereby expressly reserved.

54R

Very truly yours,



John H. Carmichael

for KULIK, GOTTESMAN & MOUTON, LLP

JHC:al

G:\WPFSOCII.doc

February 16, 2001

Four Burrell Lane  
Rancho Palos Verdes CA 90275

RECEIVED

MAR 15 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

The Mayor and the RPV City Council  
The Planning Department  
The Parks and Recreation Department  
RPV City Hall  
Hawthorne Blvd.  
RPV CA 90274

Re: EIR for Long Point

Dear Mayor and Council Members,

The past 3 years have, in my opinion, been tragic ones in our fair city. This depressing period has seen almost all of the open space in RPV gobbled up by developments: 2 huge chunks of land on either side of Crest Road were turned into streets and houses, the large bluff-top ocean frontage at the foot of Hawthorne was bulldozed and is being transformed into streets and houses, and Ocean Trails was drilled, bulldozed and turned into a golf course, with homes to follow.

I found myself feeling mournful over the all-at-once loss of open land. All 4 of these developments impacted me personally and negatively: I drive along Crest Road almost every day, passing the former open views; I enjoyed hiking in the "wilderness" for so many years at the foot of Hawthorne; and I could see the cranes and other equipment tearing up Ocean Trails from my breakfast table. Has anyone, in considering the earth movement and problems at Ocean Trails, heard the voice of God? Perhaps the Almighty is "telling" us to stop messing with His creation.

If you don't care for the spiritual interpretation, there can be no debate that bluff-top development is fraught with problems, dangers and legal repercussions. A few years ago PVE nearly went bankrupt when a house built on the bluffs with a drop dead view (i.e., step out the back door and drop to your death in the ocean) began to slide and had to be destroyed. Since PVE had granted a building permit, the owners sued the City—and won millions. Part of Paseo del Mar was closed off forever and a new land slide was born.

If RPV approves the development along the bluffs at Long Point, we can expect more of the same. ESPECIALLY if a golf course is included—all that watering and PV soil don't mix.

Enough! It's time to dig in our heels and vote against all future development of large blocks of land. I would like an ocean front home as much as the next person. But, if ever I have one, it will be because I bought a parcel of already developed land.

55A

I **adamantly** oppose the use of City land to aid developers. The Upper Point Vicente property was given by the Federal Government to the City of RPV. That means to **all** it's residents—not just developers and not just golfers. It was given to me, along with the rest of you, and I don't golf. So, if the space is "landnapped" into a golf course, I will lose access to "my" open space.

55B

I am very much in favor of the SOC II proposal. Let's all volunteer to remove exotic, invasive plant species and restore native habitat at UPV. Build a few walking trails to allow access to the property, add some benches for meditation, bird watching, and resting, and put some easily read signs identifying all the native fauna and flora. And then leave it alone!

55C

One thing we hear a lot about is "property rights." I am a property owner and I value my rights, as well as those of other owners. But we never hear about "animal rights"—the privileges due to the natives who were here first. Not just the Native Americans, but the animals species who lived for centuries on this undeveloped peninsula and now have nearly been driven out, not just by development, but by our (and I include myself) devastating use of pesticides, fertilizers, automobiles, and other forms of pollution. I live now on the edge of open space and know the problems that brings (rats, skunks, raccoons, and opossums tear up our yard and nest in our outside cupboards and garage)—but the animals were here **first**. Could the UPV project teach us how to live in harmony with these furry residents and protect ourselves and our gardens without killing them?

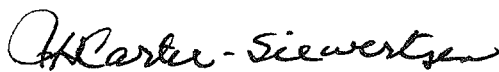
55E

As much trouble as wild animals cause in my yard, when I am hiking, the sight of a wild rabbit or, more rarely, a fox—or even a gopher—gives me an absolute thrill. This is an experience I never had before I moved to the Peninsula, and I would hate for all the wildlife to disappear.

55D

Let's make UPV a natural park with a small flower plot and a small vegetable farm—a demonstration of how to grow food and flowers naturally, without chemicals! And maybe we can get some frogs and toads (considered by scientists as signs of ecological health) to return to RPV.

Most sincerely,



R. H. Carter-Siewertsen

(310) 377-5928

**Les Evans, 07:40 AM 3/8/01 -0800, Fwd: The Long Point Resort**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Thu, 08 Mar 2001 07:40:04 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

From: bchaison@home.com  
To: <CityCouncil@rpv.com>  
Subject: The Long Point Resort  
Date: Wed, 7 Mar 2001 21:23:40 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2314.1300

3/7/01

Re: Long Point Resort

Dear Mayor, Members of the City Council and Planning Commissioners:

The time has come for me to voice my opinion. I am definitely on favor of the proposed Long Point Resort. I live and own a home on Beachview Drive. Beachview connects to the Long Point site. Needless to say, my property would be affected by the Resort. I feel that it would be a benefit.

I have owned a home in RPV for twenty-two years. I also owned a property that I rented for twelve years. I am saddened by the fact that we have not had a project like that of Long Point in years past. The time is overdue.

This project would benefit RPV and the entire peninsula. It would beautify areas that now resemble wastelands. I am referring not only to the vast Long Point site but also to the area surrounding city hall.

The financial benefits alone offer justifiable reason to approve the project. The plan protects the environment, it provides wonderful recreational facilities, and it enhances the area aesthetically.

It's time for the council members, the planning commission and the mayor to hear the vote of the silent majority. I have spoken with many residents. My estimation indicates a 88% to 90% approval rate.

Your attention to my opinion and "vote" is greatly appreciated.

Sincerely,

Bernard Chaisson

**56A**

Les Evans, 01:33 PM 3/9/01 -0800, Fwd: Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Fri, 09 Mar 2001 13:33:17 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Resort

From: bchaison@home.com  
To: <citycouncil@rpv.com>  
Subject: Long Point Resort  
Date: Fri, 9 Mar 2001 12:22:04 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2314.1300

March 9, 2001

Re: Long Point Resort

In response to Mr. Stern's request for my position as to the proposed golf course in the City Hall land area, I view the golf course as an integral part of the Long Point Resort development. I feel that the present proposal will enhance the city land area in that it will encourage RPV residents to "use" the area whether it be for "golf" or for walking or hiking designated trails. Increased public access to the ocean is also a definite plus.

I read the draft environmental impact report. It indicates that the project would not have a negative effect on the environment.

I do not negate the "importance" of the blue butterfly nor any other wildlife. However, I feel that people, the "human life", should also be considered "important".

As mentioned before, I live "next door" to Long Point. The increased traffic would be better than that experienced by the "Marineland" traffic. As, you most likely recall, Marineland had heavy traffic periods when the park opened and closed.

Sincerely,

Bernard Chaisson

57A

March 8, 2001

Mayor Lyon, Members of City Council and Planning Commission  
City of Rancho Palos Verdes  
3094 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: Long Point Resort

Dear Mayor Lyon, Members of City Council and Planning Commission:

As a long time resident of Rancho Palos Verdes, I've watched the city grow. I have been an attentive, if not vocal member of the community.

I have read, listened and studied information about the Long Point Resort. I believe it's been about four years now that I've paid special heed to this project.

**I wholeheartedly support this project.** I find that it would benefit the community in many ways. Needless to say the city could readily use the \$ benefits. Perhaps Long Point revenues could pay for the Interpretive Center problem.

58A

I believe that the City Hall area would be much improved due to this project. That area has been an eye sore since I moved to RPV in 1979.

I would truly appreciate a hotel in the area. There are times when my house goes into overload and times when it would be nice to have friends and family stay nearby but not in my home.

I could go on and on about the benefits of the proposed resort and the personal reasons for my desire to have the project approved. Call me if you care to hear them - my home # is 377-0442.

Please approve the plans for the Long Point Resort.

Yours truly,

  
Cindy Chaisson

P.S. My address is 6517 Beachview, RPV.

10 PEPPERTREE DRIVE  
 PORTUGUESE BEND  
 RANCHO PALOS VERDES  
 CALIFORNIA 90275

Chairman and Members of the Planning Commission  
 Rancho Palos Verdes

I am unable to attend this meeting because it is necessary for me to be at the ACLAD meeting, and so I am asking that this letter be read for me. While I was listening to the discussion at the recent hearing on the NCCP for the city, I realised that I did not understand in the least why the Upper Vicente property, which I understand to be public land, was included in the NCCP. I had thought that the plan was intended to preserve as much coastal habitat as possible on private property which is potentially developable, and the Upper Vicente property should not be considered as fitting this description.

Jim Monaghan had what he considered to be a viable project for Long Point for which he had obtained the necessary permits before he was boarded and sunk by York Capital Group, and/or Destination Resorts, Lowe Associates etc. etc., and his plan did not depend upon use of public land to turn a profit. I have heard that the position of Destination Resorts is that without the incorporation of public land for a golf course into their plan, the project is no go. This is clearly a poker game and that is a bluff. It is simply not possible that they are prepared to pick up their bat and ball and go home if they cannot have the use of the public land. At the last community leaders' breakfast I was told (by the city manager I think) with some pride that the city is now financially very healthy, so why are we even considering the sale of our birthright for a mess of pottage? It merely enables the developer to use his property to build yet more bungalows, casitas, cabanas, whatever the theme du jour is, to maximise his profit at our expense and land which could be enjoyed fully by generations to come is lost forever.

Public land is no longer available for general public use once it becomes a golf course, even a public one. I have said before and I will repeat myself now, someone once said that golf is a good walk spoiled and a golf course in my opinion is open space ruined. The plan put forth by SOCH to create something from this land which we can all enjoy is an excellent one, and it is beyond me to understand why, in the face of the strongly expressed feelings of the residents of the city to whom title to the land in question properly belongs, donating it to maximise the profits of the developers is still seriously under consideration.

59A

Submitted at P.C. Hearing:  
 3-13-01



The question addressed in the EIR , of how much habitat the developer is magnanimously prepared to restore , is a needless one; if you don't destroy habitat there is no need to restore it, and restoration per se has been demonstrated to be a doubtful process at best, only ever approximating what is lost.

The plan for the development of the Long Point property need not and should not include the use of the Upper Point Vicente property.

*D. E. Clarke*

59A

Herbert Clarkson, 07:20 PM 3/31/01 -0800, Long Point EIR Comment

---

To: davids@rpv.com  
Date: Sat, 31 Mar 2001 19:20:35 PST  
Subject: Long Point EIR Comment  
X-Mailer: Juno 5.0.27  
From: Herbert Clarkson <hclarkson@juno.com>

April 1, 2001

Long Point EIR Comments:

The discrepancies in the Long Point EIR are many as evidenced at the Planning Commission meeting of March 13th, 2001. There is no need to reiterate these points again other than we support the comments made.

In addition, we are opposed to a private developer using city owned land for his financial viability. The Planning Commission should not issue permits accordingly.

Herb & Dodie Clarkson  
6424 Seabryn Drive  
Rancho Palos Verdes CA 90275

60A

April 6, 2001

Chairman Lyon and Planning Commissioners,

**Long Point Resort --- Yes --- but which plan?**

We are NOT against the long approved Long Point Resort and we do not know anyone who is --- even SOC II. Most residents are in agreement that a resort at the former Marineland property would be a good addition to the city of RPV. The question is which Long Point Resort plan? The owner of that property has had permits to build a hotel, golf course, casitas and various other commercial facilities extended every year for several years. That project could have been completed and operational years ago but the developer has chosen not to build. We all agree that Long Point has a right to build on their property in accordance with the approved permits. We do not agree that the developer should be allowed to lease city owned property for his financial viability. And we do not agree that his golfing guests should have priority for the use of our land with its spectacular views.

The developer's latest idea is to move 6 holes of golf from privately owned Long Point property to city owned property at Upper Pt. Vicente, that is if he can successfully entice you and other city officials to comply with his wishes. In the space previously planned for golfing, the developer would add 32 villas thus enabling him to obtain additional profit. *Excellent thinking on his part.* He now alleges that there is simply not enough room on the Long Point site to accommodate the hotel, related facilities and 9 holes of golf. And if there is no golf course, *of course* the Resort can't fly. What will the developer want to do next --- possibly swap some of his less desirable land for the Upper Pt. Vicente land?

61A

Most residents are FOR a Resort at Long Point --- but which plan?

We are FOR the plan that has already been approved by RPV and the Coastal Commission that includes a hotel, golf course, casitas and other commercial facilities. Let the developer make use of those permits he has been renewing every year. Just do it.

We are AGAINST the current, expanded plan which imagines the developer using city owned land. Simply said, that land is not his land to use. It belongs to all the citizens of RPV as stated in the deed restrictions of 1979. The city should be scrupulous about conforming to the terms of that deed. Further, it is public land and cannot be sold or leased nor can it be released as a concession without the approval of the Interior Department.

Let us make use of our land in a way that all citizens can enjoy forever. At least be open to what everyone has to say and what they want. You may be surprised to learn just how diverse the donated resources would be that are necessary to achieve this goal. Reach out to those citizens now before it is too late.

Remember - a person's mind is like a parachute --- it only works when it is open.

Sincerely,

Herb & Dodie Clarkson  
6424 Seabryn Drive  
Rancho Palos Verdes CA 90275

RECEIVED

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Les Evans, 09:47 AM 3/9/01 -0800, Fwd: The Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Fri, 09 Mar 2001 09:47:16 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

From: "cnni" <cnni@email.msn.com>  
To: <CityCouncil@rpv.com>  
Subject: The Long Point Resort  
Date: Fri, 9 Mar 2001 09:34:27 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2615.200

Dear Mayor and City Council,

As a long term resident of RPV., I am writing to support the development of The Long Point Resort.

It will add class and beauty to our community.

It will produce badly needed revenue for our City.

It will erase an eyesore.

Please do everything you can to help make this resort successful in the long run. Do not give limited approval which may hamper the ultimate success of this project.

Thank you,

Mr. and Mrs. Robert L. Cole  
28307 S. Ridgethorne Ct.  
Rancho Palos Verdes, CA 90275  
377-0536

62A

April 28, 2001

Mayor Lyon  
Members of the City Council  
And Planning Commission  
30940 Hawthorne Boulevard  
RPV, CA 90275

RECEIVED

MAR 30 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mayor Lyon and esteemed Council Members:

Please approve the Long Point Resort development.

Please include the development of a softball complex on the Lower Point  
Vicente property in the approval.

63A

THANK YOU!

The Cooper Family  
Bill, Cori, Taylor, Kaysee and Ricci ☺

Bill,  
Cori, Taylor,  
Kaysee  
Ricci

Barbara Carey  
March, 2001

T.C. 3-26-01

Problem Intersections

(Pages 8, 9, 10, 11)  
DEIR

Existing  
Table 7

Existing plus  
Anticipated Growth  
Table 4

Existing plus  
Anticipated Growth  
plus Other Development  
Table 7

Existing plus  
Anticipated Growth plus  
Other Development  
Table 4

Mentioned on page 80 of the  
Traffic Analysis, DEIR  
Table 10  
"Project Fair Share Contribution"

Palos Verdes Boulevard (NS) at: Palos Verdes Drive West - North (EW)	DC	ED	ED	ED	
Silver Spur Road (NS) at: Hawthorne Boulevard (EW)	DE	EF	EF	EF	★
Hawthorne Boulevard (NS) at: Sepulveda Boulevard (EW)	DF	EF	EF	EF	
Hawthorne Boulevard (NS) at: Pacific Coast Highway (EW)	EF	EF	FF	EF	
Hawthorne Boulevard (NS) at: Palos Verdes Drive North (EW)	ED	ED	ED	EE	★
Western Avenue (NS) at: Palos Verdes Drive North (EW)	DE	EE	EE	EE	
Western Avenue (NS) at: 25 <sup>th</sup> Street (EW)	AB	BC	BC	BD	★
Palos Verdes Drive East at: Palos Verdes Drive South	AA	AA	AA	AB	

64A

MAR 16 2001

PLANNING, BUILDING,  
CODE ENFORCEMENT**Who Will Pay for a Traffic Signal at Intersection of PVE and PVS?**

By Barbara Covey, 15 March 2001

When the Ocean Trails Project is completed and if the Long Point Project is approved as planned, these two developments will cause considerable increased traffic at the intersection of Palos Verdes Drive East and Palos Verdes Drive South. Who is going to pay for the traffic signal that will be needed there?

I have been studying a document called "Long Point Resort-Draft Environmental Impact Report, Excerpts compiled for Rancho Palos Verdes Traffic Committee consideration including... 15.12 - Traffic Impact Analysis." Nowhere do I find assurance that the Long Point Resort project will help pay for the traffic signal that will be needed where Palos Verdes Drive East intersects Palos Verdes Drive South.

On page 80, the report includes a table that shows the project's fair share contribution for a variety of intersections that will be adversely affected if the resort is approved. It does not mention the intersection at Palos Verdes Drive East and Palos Verdes Drive South. I believe that it should be included.

The report shows that 840 vehicles now pass through this intersection during the peak morning hour.<sup>1</sup> That's 420 going one way and 420 going the other. (There are others that make right and left turns. Such vehicles will not be included here.)

In the afternoon peak hour, 1,037 vehicles now pass through this intersection, with 456 going west and 581 going east.<sup>2</sup>

Under most circumstances, these totals would grow to 890 vehicles in the mornings and 1,098 in the afternoons, according to maps called "Existing plus Ambient Growth AM and PM peak hour intersection volumes" that give these numbers.<sup>3</sup>

However, considerably more vehicles are predicted when the Long Point Resort is completed. This report says, "The proposed development (at Long Point) is projected to generate approximately 6,263 trip-ends per day with 313 vehicles per hour during the AM peak hour and 499 vehicles per hour during the PM peak hour."<sup>4</sup> A "Project Trip Distribution" estimates that 45% of these additional vehicles would pass through the intersection of Palos Verdes Drive South and Palos Verdes Drive East.<sup>5</sup>

<sup>1</sup> Long Point Resort - Draft Environmental Impact Report, Excerpts compiled for Rancho Palos Verdes Traffic Committee consideration including... 15.12 - Traffic Impact Analysis, "Existing AM peak hour intersection volumes," page 23.

<sup>2</sup> Op. cit., "Existing PM peak hour intersection volumes," page 24.

<sup>3</sup> Op. cit. "Existing plus Ambient Growth AM and PM peak hour intersection volumes", pages 39 and 40.

<sup>4</sup> Op. cit., p. 8.

<sup>5</sup> Op cit., p. 31.

65A

That would mean about 141 additional vehicles (45% of 313) in the mornings for a total of 1031 (141 plus 890), and 225 more (45% of 499) in the afternoons for a total of 1323 (225 plus 1098), if Long Point is completed as shown in the Environmental Impact Report.<sup>6</sup>

On the other hand, the Report's Traffic Impact Analysis seems to imply that a traffic signal would already have been installed at this corner by the time the Long Point project is completed. It says, "A traffic signal is projected to be warranted at the following additional study area intersection for Existing plus Ambient Growth plus Other Development Traffic Conditions... (underlines mine)." This intersection is identified as Palos Verdes Drive East at Palos Verdes Drive South.<sup>7</sup> The "other development traffic conditions" can refer only to traffic generated by the Ocean Trails project.

The numbers of vehicles expected in the intersection after Ocean Trails is completed are 1,051 in the mornings and 1,320 in the afternoons.<sup>8</sup>

When both Ocean Trails and Long Point are complete, the projected number of vehicles passing through this intersection will climb to 1,192 in the mornings and 1,544 in the afternoons, according to the Environmental Impact Report and its accompanying Traffic Impact Analysis.<sup>9</sup>

Does Rancho Palos Verdes have an agreement with Ocean Trails that the development will pay for the traffic signal at the intersection of Palos Verdes Drive South and Palos Verdes Drive East? What if Long Point Resort Project is completed before Ocean Trails? Shouldn't both developments be held accountable for traffic caused by their presence?

There will be a need for a signal at this intersection whenever the peak volumes climb to their maximums. Who is going to pay for it? I believe this must be spelled out, in writing, now.

BARBARA L. COREY  
2742 San Ramon Drive  
R.P.V. CA 90275  
barbarac24@yahoo.com  
310-833-6740

<sup>6</sup> Separately, these numbers are shown as 1,031 and 1,322 on a map called "Existing plus Ambient Growth plus Proposed Project AM and PM peak hour intersection volumes," pages 46 and 47.

<sup>7</sup> Op. cit., page 65.

<sup>8</sup> Op. cit., "Existing plus Ambient Growth plus Other Development Traffic Conditions AM and PM peak hour intersection volumes," pages 68 and 69.

<sup>9</sup> Op. cit., "Existing plus Ambient Growth plus Other Development Traffic Conditions AM and PM peak hour intersection volumes," pages 74 and 75.



Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, Ca 90275

Dear Mayor, Members of the City Council and Planning Commission:

RE: The Long Point Resort

This letter is to lend my support to the development of The Long Point Resort. Rancho Palos Verdes, actually the entire peninsula, is in need of a HOTEL let alone a world class destination resort.

The old Marine site is an eye sore and this development would be a benefit for all of residences of the peninsula .

I support the use of City land for the golf course, as their proposal will benefit more than the golfer. The hiking trails, parks, and natural vegetation that will be restored are just another benefit for all.

And let us not forget Rancho Palos Verdes can well use the tax revenues that will be generated by this beautiful addition to our city.

Lets not let this opportunity to enrich our city not come to fruition.

Sincerely,

Jeanne A. Crosby  
30043 Knoll View Drive  
Rancho Palos Verdes, CA 90275

66A

DEAR MAYOR LYON,

I AM A 11 YEARS OLD AND I PLAY SOFTBALL, ~~THESE~~  
WE WOULD BE VERY APPRICIATIVE IF YOU FOUND US SOME  
MORE FIELDS. WE HAVE TOO LITTLE. SOME OF OUR  
FIELDS ARE WAY TOO SMALL FOR MANY OF THE  
OLDER GIRLS. FIND US SOME MORE

67A

PLEASE

Sincerely,

~~Keelin~~  
~~Marie~~  
Keelin  
Marie Deason

**Les Evans, 11:25 AM 3/28/01 -0800, Fwd: Long Point use of public lands**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 11:25:11 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point use of public lands

From: Mark Detwiler <MDetwiler@bebe.com>  
To: "citycouncil@rpv.com" <citycouncil@rpv.com>  
Subject: Long Point use of public lands  
Date: Wed, 28 Mar 2001 10:29:42 -0800

Dear Council Members,

The use of public land for the benefit of a private developer will amount to nothing more than a sellout by the city of Rancho Palos Verdes. It's fundamentally and morally wrong!

This benefits only golfers. Think I will be allowed to take a walk on the "public" fairways to take in the views while golf balls are flying? The city will also take on liability for golf balls hitting cars or walkers/ runners on Palos Verdes drive. Think about that!

York / Destination Resorts has the right to develop on their private property. (Though I believe the hotel will fail as a business and the city will be stuck with another white elephant eyesore for lack of convenient access). If they can't maximize the Long Point property for golf then that's their problem!

Thank you for your time.

Mark Detwiler  
mailto:mark@msdetwiler.com

**68A**

Les Evans, 10:31 AM 3/13/01 -0800, Fwd: Longpoint Map- Comments

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 13 Mar 2001 10:31:28 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Longpoint Map- Comments

From: "Suzanne Detwiler" <suzie@msdetwiler.com>  
To: "RPV City Council" <citycouncil@rpv.com>  
Cc: "Doug Stern" <douglas.stern@worldnet.att.net>  
Subject: Longpoint Map- Comments  
Date: Tue, 13 Mar 2001 10:29:07 -0000  
X-Mailer: Microsoft Outlook IMO, Build 9.0.2416 (9.0.2910.0)  
Importance: Normal

Dear City Council member,

I am highly opposed to the submitted plan as depicted by the map of the Long Point project.

I am in favor of the area around the city hall remaining as public property and restored to a habitat area/educational park as was discussed at a recent council meeting.

I am opposed to the city selling their property for this project as well as building a tunnel under the road.

The project once completed, I fear, would not be financially lucrative anyway. The amount of traffic on PV Dr S. is already heavy and taking a toll on the integrity of the pavement.

Please do not go forward with this project.

Suzanne and Mark Detwiler  
12 year residents!

69A

Janet Driskell, 10:18 PM 3/7/01 -0800, Proposal for City to stop consideration of Long Point Resort

X-EM-Version: 5, 0, 0, 0  
 X-EM-Registration: #3003520714B31D032830  
 Reply-To: janetdriskell@earthlink.net  
 X-Mailer: EarthLink MailBox 5.02.8 (Windows)  
 From: "Janet Driskell" <janetdriskell@earthlink.net>  
 To: "City Council" <CityCouncil@rpv.com>  
 Cc: PVNedit@aol.com, letters@dailybreeze.com, davids@rpv.com,  
 citymanager@rpv.com, parks@rpv.com  
 Subject: Proposal for City to stop consideration of Long Point Resort Project from using City properties  
 Date: Wed, 7 Mar 2001 22:18:30 -0800

To: Mayor, City Council and the residents of RPV  
 I am writing this letter to request the City Council of RPV to adopt and execute the following proposal:

PROPOSE: Please withdraw any and all considerations of the Long Point development from their proposed use of any city property, city park or city open space.

I have circulated the Save Our Coastline II (SOC II) petition in my town home complex of Villa Capri (49 homes), the only residential area directly adjacent to the Upper Point Vicente Park. In essence this petition says: Save Our Park and do not allow any private developer to alter or change our park, for golf or any other activity. Los Verdes golf course is less than one mile from our park. Of the 49 residents at Villa Capri, I have spoken to 45. Of these 45 residents, a total of 41 have signed the petition to Save Our Park. In addition to my efforts, SOC II has received well over 3,000 signatures from RPV residents supporting this petition. This petition sends a loud and clear voice to our elected officials and City staff- Save Our Park!

I have read the proposals of the Long Point Environmental Impact Report (E.I.R.). Of the 92 environmental factors listed in the E.I.R., 65 headings are listed as having "a potentially significant impact" if the resort were to be built as planned. This is 70%, far too many items to be "mitigated" away by a private, commercial developer. I think Mr. York at Long Point will have more than enough problems getting HIS property passed through the many government agencies involved without trying to alter and change the use of Upper Point Vicente Park and its passive open space. No amount of mitigation can replace the tranquility and peace we now enjoy living next to the City's oldest park.

In addition, by withdrawing any proposed commercial development of our park, the City of RPV would send a very positive message to all government agencies that we are most sincere in implementing a strong Natural Community Conservation Plan (NCCP). In accepting my proposal, I am also asking that the City adopt the "Point Vicente Park Enhancement" Alternative presented

70A

by SOC II (Exhibit 7.6)of the E.I.R.

Everyone wins when this proposal is accepted and executed. Please Save Our Park and the open space for all citizens to enjoy, now and in the future.

I await your decision.

Sincerely,

Rowland Driskell  
30 Via Capri  
Rancho Palos Verdes, Ca 90275  
(818) 372-4522 pager  
e mail: janetdriskell@earthlink.net

70A

## PUBLIC COMMENT FORM

APR 03 2001

## PROJECT NAME:

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

## NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell  
 30 VIA Capri RPU CA 90275

Telephone Number: 310 544 4183

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

NO GOLF OF ANY KIND  
 AT POINT VICENTE PARK

1) LOSS OF SAFETY

71A

2) LOSS OF TRANQUILITY (DAWN TO DUSK)  
 GOLF

71B

3) LOSS OF EXISTING NATIVE HABITAT

71C

4) OUR 49 HOMES OF VILLA CAPRI  
 CANNOT TOLERATE ANY MORE WATER  
 FROM ANY GOLFING DEVELOPMENT

71D

5) LOSS OF PURE, PASSIVE OPEN SPACE

71E

PLEASE! Rowland

3.14.01

L.P. D.E.I.R.

L.P. "CONCESSION" TO MOVE PRACTICE FACILITY TO THEIR PROPERTY & INSTEAD HAVE 2 HOLES OF GOLF ADJACENT TO VILLA CAPRI IS ALSO UNACCEPTABLE. 41 OF 46 VILLA CAPRI RESIDENTS SIGNED SOC II PETITION TO SAVE OUR PARK, PERIOD. NO GOLF AT UPPER POINT VICENTE PARK!  
(now 42 of 47)

72A

Other reasons to reject their latest proposal are:  
a) 2 holes of golf directly adjacent to Villa Capri is the most dangerous SCENARIO of all proposals. NETS WOULD HAVE TO BE ADDED TO PROTECT RESIDENTS, GUESTS & PROPERTY. This of course is totally UNACCEPTABLE for the obvious reasons - ugly & loss of view & depreciation of value to our homes.

72B

b) Almost no viable habitat. what little habitat for native, endangered species would be fragmented & useless.

72C

c) DAWN to dusk activities would ruin our tranquility we now enjoy.

72D

d) WATER - practice facility or holes of golf would add water near U. Capri foundations. OUR RECENT, REMEDIAL CONSTRUCTION WHICH ADDED CONCRETE AROUND OUR FOUNDATIONS TO KEEP water away - ANY golf would add water to the field

72E

Rowland Dinkell

ALTERNATE #5?



## PUBLIC COMMENT FORM

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

ROWLAND DRISKELL

30 VIA CAPRI RIV

Telephone Number: 310.544.4183

5  
TOTAL  
PAGES

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

PLEASE SEE THIS PAGE, PLUS 4 FOLLOWING

LETTER TO DISPUTE COMMENTS

MADE BY PRESIDENT OF HOA of  
VILLA CAPRI

4 OF THE MANY REASONS TO BE AGAINST  
ANY GOLFING ACTIVITIES @ UPPER POINT  
VICENTE PARK.

1. DECREASED SAFETY TO OUR HOMES / RESIDENTS
2. INCREASED NOISE
3. INCREASED TRAFFIC
4. DECREASE CITY INVENTORY OF PARKLAND

173A  
173B  
173C  
173D

Rowland Driskell

RECEIVED

3.18.2001

MAR 20 2001

TO: Earl D. Butler, Chairperson of RPV. Finance Advisory Committee  
David Snow, RPV. Planning Commission  
FROM: Rowland Driskell  
30 Via Capri RPV.

PLANNING, BUILDING,  
& CODE ENFORCEMENT

On December 12<sup>th</sup> 2000 I attended a RPV. Finance Advisory Committee meeting. During this meeting reference was made repeatedly about a past due study from a firm called "HVS". It was to be a marketing / feasibility study done concerning the proposed Long Point Resort. The committee said they could not advise RPV. City Council about the proposed Resort until this study was received and analyzed. Where is this report? Does it exist? If the report does exist, then why is it not a part of the Draft E.I.R.? Council members have told me repeatedly that the only reason Council is considering a concession of city parkland to a developer is so the city can profit from the resorts' bed tax. If it cannot be proved that the resort is feasible, then why waste everyone's time considering the resort and a concession of invaluable city parkland? Also, when will the next Finance Advisory Committee meeting take place? The most recent meeting was cancelled and now I've been told that the next meeting would be AFTER April 6<sup>th</sup>, the cutoff date for comments from the RPV. Citizenery. How odd! Please advise, I'm very concerned.

74A

Sincerely,

*Rowland Driskell*

Rowland Driskell  
30 Via Capri, RPV.  
Fax: 310.265.0504

C.C: The Editors of: The Daily Breeze  
The Palos Verdes Peninsula News  
Dennis McLean, Finance Director RPV.  
RPV. City Council & LES EVANS

CITY MGR.

4

To:

RECEIVED

MAR 20 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

TO: The Editor of  
Palos Verdes  
Peninsula News

From: Rowland Duske  
30 VIA CAPRI RPV CA  
310 544 4183

TOTAL PAGES: 7

PLEASE PAGE ME. IF YOU DO NOT  
RECEIVE ALL 7 PAGES  
Thank you - 818 372 4522

75A

DRAFT E.I.R.

CC: DAVID SNOW - PLANNING - RPV  
CITY COUNCIL of RPV  
Nick GREEN - DAILY BREEZE

GINA PARK (please distribute to  
City Council - thanks)

# PETITION TO THE CITY COUNCIL OF RANCHO PALOS VERDES

I urge the City Council to retain all public land for general public use or open space.

Print Name	Street Address	City	Signature	Date
RUSSELL HUDAK	38 Via Capri	RPV	R. Hudak	1/14/01
DIANA HUDAK	38 Via Capri	RPV	<del>DIANA</del>	1-14-01
Su X Sub	42 Via Capri	R.P.V.	<del>Sub</del>	1-14-01
DIANNE PAYNE	44 Via Capri	RPV	D. Payne	1-15-01
ELIZABETH STONE	48 VIA CAPRI	RPV	Elizabeth Stone	1-15-01
BRIER WITKES	48 Via Capri	RPV	B. Witkes	1-15-01
PAUL FAYNE	52 Via Capri	RPV	P. Fayne	1/15/01
CHARLIE KONG	60 VIA CAPRI	R.P.V.	C. Kong	1/15/01
Tim G. Hibner	3 Via Capri	RPV	T. Hibner	2/14/01
KOBAS EUGENE	66 Via Capri	RPV	E. Kobas	2-14-01
PAULA BERNSTEIN	3 VIA SAN RAMO	RPV	Paula Bernstein	2-22-01
Yoko KIMURA	1 Via San Ramo	RPV	Y. Kimura	2-22-01
Young Kim	46 Via Capri	R.P.V.	Y. Kim	Feb/22/01
Baik S. Shin	3 Via Veneta	RPV	B. Shin	2-23-01

SEE ATTACHED  
Letter reeking  
Signature

75A

## WE ARE AGAINST

The new plan for the Long Point Resort still includes 68 acres of the public's land around City Hall. The developers have reduced their golf course to 9 holes (already approved for their own 103 acres), but they want to place 4 of the holes and a practice facility on public property.

Please return petitions to SOC II, P.O. Box 3984, Palos Verdes Peninsula, CA 90274 when complete.

Collected by Rowland Driskell  
30 VIA CAPRI

PETITION TO THE CITY COUNCIL OF RANCHO PALOS VERDES

I urge the City Council to retain all public land for general public use or open space.

Print Name	Street Address	City	Signature	Date
B. J. LAUHOFF	111 VIA SAN REMO	ROV.	B. J. Lauhoff	2/27/01

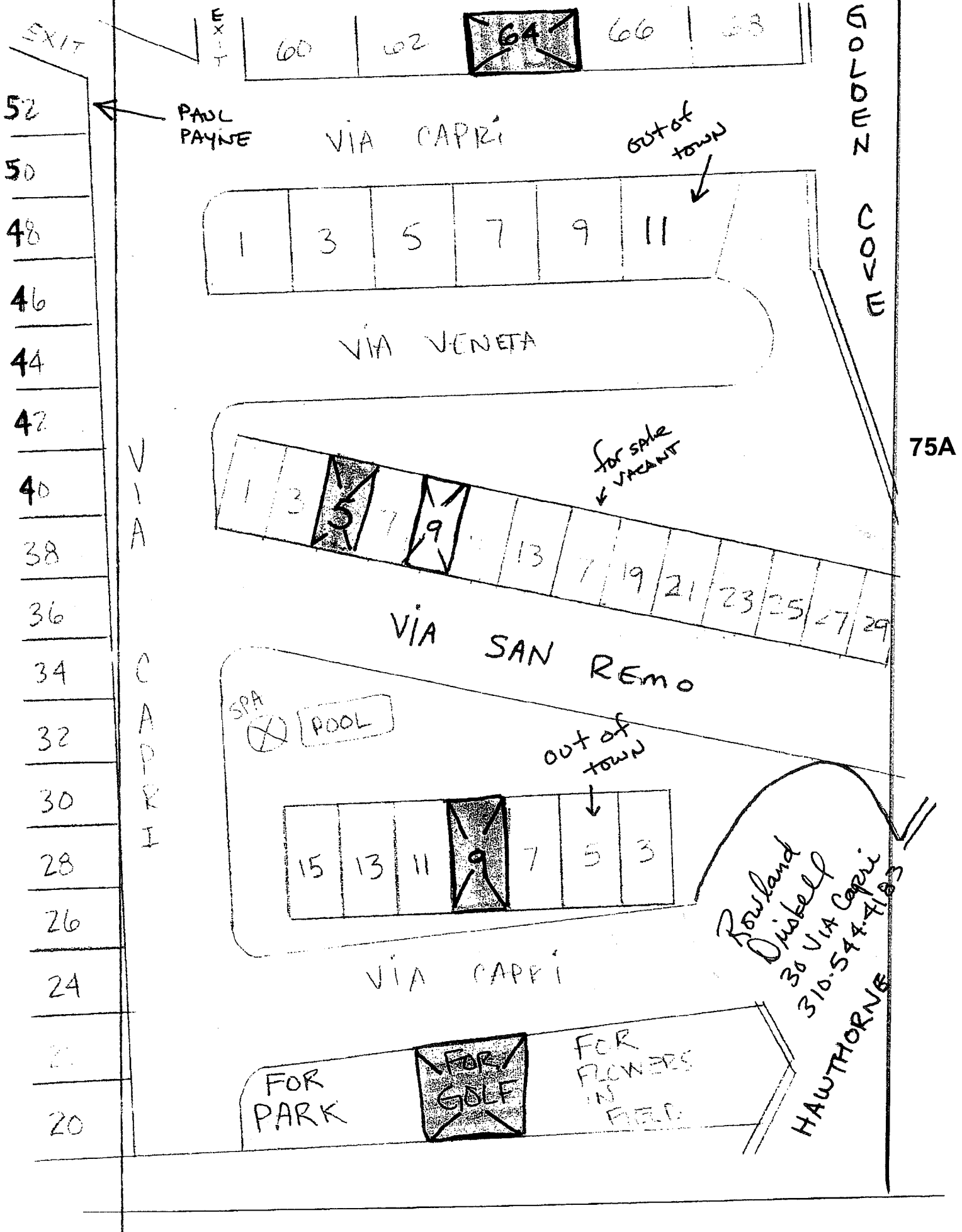
75A

WE ARE AGAINST

The new plan for the Long Point Resort still includes 68 acres of the public's land around City Hall. The developers have reduced their golf course to 9 holes (already approved for their own 103 acres), but they want to place 4 of the holes and a practice facility on public property.

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Collected by Rowland Dinsell  
30 VIA CAPRI



City Council - (P. 11)

have reduced their golf course to 9 holes (already approved for their own 103 acres), but they want to place 4 of the holes and a practice facility on public property.

Please return petitions to SOC II, P.O. Box 3984, Palos Verdes Peninsula, CA 90274 when complete.

Collected by

Rowland Driskell  
30 VIA CARPI

~~Juanne Rodriguez~~ 20 Via Carpi  
~~Sophia Jr~~ 1 Via Veneta RPI

~~Juanne Rodriguez~~ 2/14/01

WE ARE AGAINST

The new plan for the Long Point Resort still includes 68 acres of the public's land around City Hall. The developers have reduced their golf course to 9 holes (already approved for their own 103 acres), but they want to place 4 of the holes and a practice facility on public property.

Please return petitions to SOC II, P.O. Box 3984, Palos Verdes Peninsula, CA 90274 when complete.

Collected by

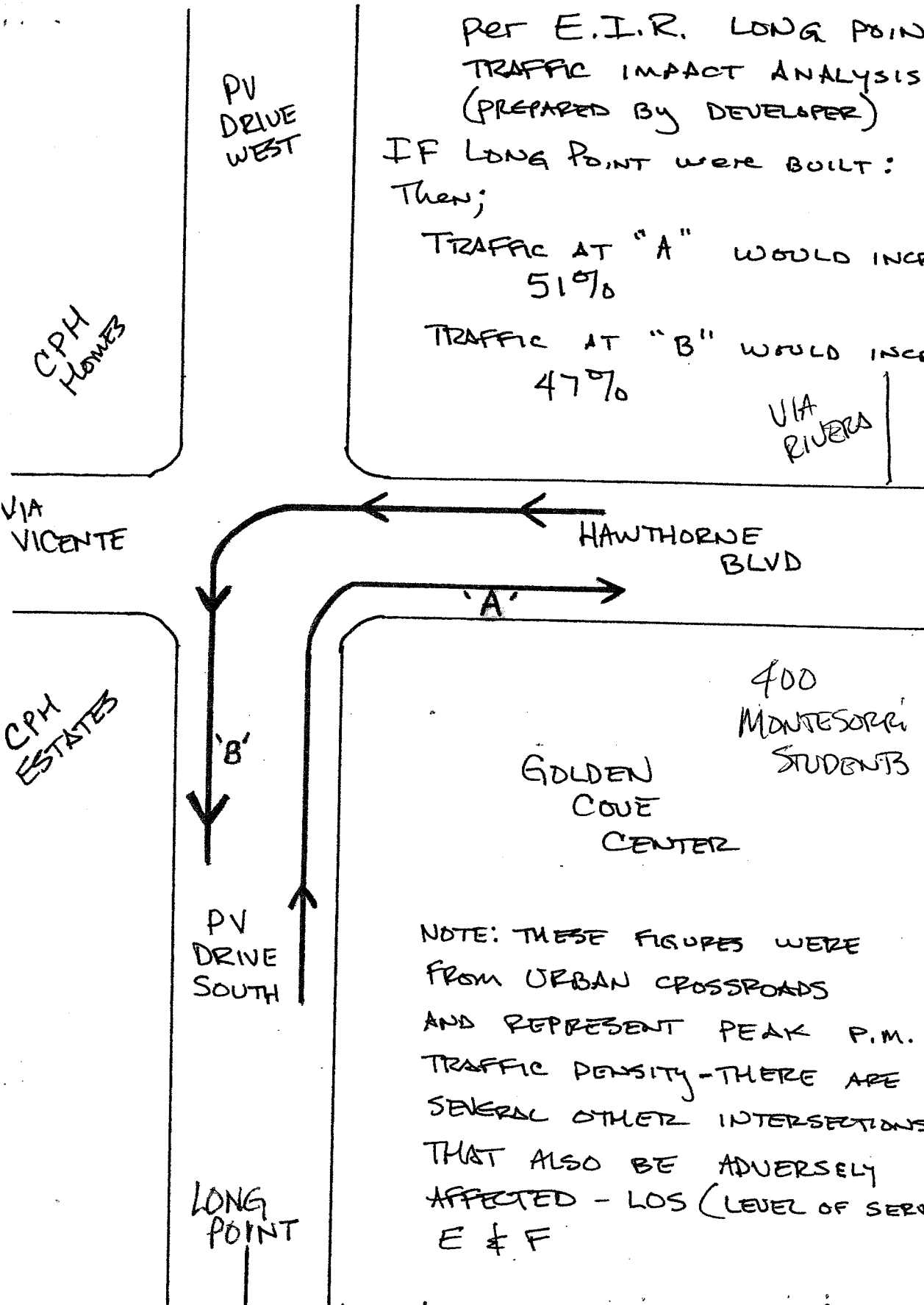
Rowland Driskell  
30 VIA CARPI

75A

PER E.I.R. LONG POINT  
TRAFFIC IMPACT ANALYSIS  
(PREPARED BY DEVELOPER)  
IF LONG POINT WERE BUILT:  
Then;  
TRAFFIC AT "A" WOULD INCREASE  
51%  
TRAFFIC AT "B" WOULD INCREASE  
47%

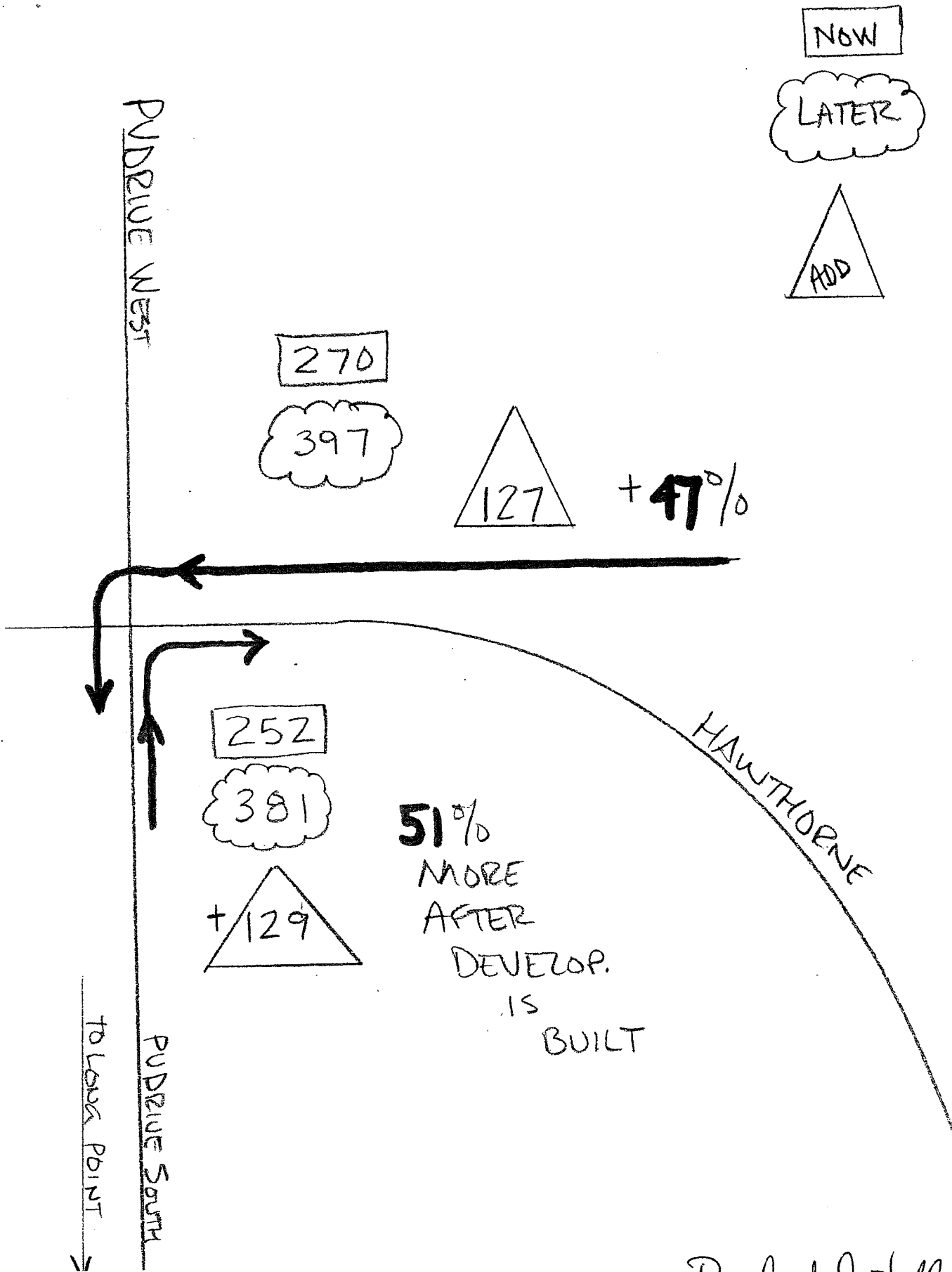
VIA  
RIVERS

76A



Rowland Distell





Pearland District

## PUBLIC COMMENT FORM RECEIVED

APR 04 2001

4/4/01

PROJECT NAME:

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell 30 VIA CAPRI RPU CA  
90275

Telephone Number: 310.544.4183

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

HOW CAN PROJECT SALESMAN, MIKE MOHLER, PROMISE NOT TO PLACE GOLF PRACTICE FACILITY NEXT TO 49 HOMES OF VILLA CAPRI WHEN THE GOLF SAFETY EXPERT SAYS THAT THIS IS THE ONLY LOCATION THE PRACTICE FACILITY COULD GO. I QUOTE FROM LAST PAGE OF LETTER DATED 9.12.2000 BY KIPP SCHULTZES DRIVING RANGE: RECOMMENDATION "THERE IS REALLY NO WAY THAT THE RANGE IN THIS LOCATION COULD BE DESIGNED MUCH GIVEN ALL THE CONSTRAINTS (AND FRANKLY THERE IS NO OTHER PLACE ON THE PROPERTY WHERE THIS COULD REALLY GO)....."

SO IF WE "ACCEPT" THE SALESMAN'S PROMISE (WHICH I DON'T) AND HAVE 3RD & 4TH HOLES NEXT TO VILLA CAPRI - THEN THAT SCENARIO IS THE MOST DANGEROUS OF ALL GOLF HOLE PLACEMENTS - PER THE SAFETY EXPERT

SEE PAGE (2)



77A

PUBLIC COMMENT FORM

Page 2

4/4/2001

PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Diabell 30 Via Capri PPV CA  
90275

Telephone Number: 310. 584 4183

COMMENTS:

CONTINUED

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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ALTERNATIVE #5 - HOLE # ADJACENT TO V. Capri

1. 2ND/ shot is "BLIND" - golfers can't see where the ball is going - they would have to yell "FORE" -

2. PAGE 2 of KIPP SCHULTIES LETTER OF 1.23.2001  
RECOMMENDATION: USE ALTERNATIVE "A"

3. PAGE 3 - "TO AVOID CONFLICTS WITH SHOTS GOING INTO THE PEDESTRIAN AREA OR OFF THE PROPERTY (INTO V. Capri!!!) THE SECOND LANDING AREA WOULD NEED TO BE MOVED TO THE RIGHT APPROXIMATELY 80 TO 100 FEET (AT THE VERY LEAST), HOWEVER, BY MOVING THIS OVER TO THE RIGHT, THE SECOND LANDING AREA WOULD THEN BE IN THE DIRECT FLIGHT PATH OF SHOTS OF THE 4TH TEE - A VERY DANGEROUS SITUATION FOR PLAYERS ON THE THIRD HOLE."

OUR SAFETY AND THAT OF THE GOLFERS CANNOT BE MITIGATED OR RELIEVED.

"SHOE HORNING" A GOLF COURSE NEXT TO VILLA Capri IS UNACCEPTABLE!!!! See page 3 ↓

77B

MR. EARL D. BUTLER

01.12.01

TO: MAYOR & CITY COUNCIL OF R.P.V.  
DIRECTOR OF PARKS - R.P.V.

My neighbor, Janet Weisman  
who lives @ 20 Via Capri RPV  
HAS HAD 3 GOLF BALLS HIT HER  
HOUSE, ONE OF WHICH BROKE A LIGHT  
FIXTURE. JANET LIVES NEXT TO  
HAWTHORNE BLVD & these golf  
balls ARE coming from Los Verdes  
Golf course. There may have been  
MORE INSTANCES but for sure it  
HAS happened 3 times. JANET IS VERY  
UPSET AT THE POSSIBILITY THAT  
HER BACKYARD - Pointe Vicente Park -  
WOULD BECOME A GOLF-COURSE  
AND/OR DRIVING RANGE - AS AN I.  
PLEASE - PRESERVE OUR PARKS!!

77C

Thank  
you

Rowland  
Driskell

UPDATE:

Tim G. Hibsoner  
#3 Via Capri - had a golf ball  
from Los Verdes Golf course  
break one of his windows last month  
4.4.01

Rowland Driskell  
30 VIA CAPRI RPV 90275  
310 544 4183  
CELL - 818.612.1767

Long Point  
Draft E.I.R.  
Safety

PUBLIC COMMENT FORM

RECEIVED

PROJECT NAME:

APR 04 2001

Program Environmental Impact Report (EIR) for the Long Point Resort Project

PLANNING, BUILDING,  
& CODE ENFORCEMENT

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell  
30 VIA CAPRI RIV CA 90275

Telephone Number: 310 544 4183

COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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Section 5.10.2 - ASBESTOS CONTAINING MATERIAL,  
LEAD BASED PAINTS & UNDERGROUND STORAGE  
TANKS AT UPV PARK - DEVELOPMENT & GRADING  
PROPOSED COULD UNCOVER MANY PROBLEMS  
THAT COULD BE AVOIDED IF THE CITY PARKLAND  
WERE LEFT UNDISTURBED -  
POINT VICENTE INTERPRETATIVE CENTER  
SHOULD SERVE AS A LESSON TO ALL.

77D

Rowland Driskell

# PUBLIC COMMENT FORM

RECEIVED

APR 04 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

## NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell  
30 VIA CAPRI RPO 90275

Telephone Number: (310) 5444183

## COMMENTS:

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### TRAFFIC

The DRAFT E.I.R DOES NOT  
INCLUDE AN ANALYSIS OF THE  
ONE (1) MILE PORTION OF 1<sup>ST</sup> STREET  
IN SAN PEDRO - BETWEEN GAFFEY &  
WESTERN. THERE IS CURRENTLY 3 STOP LIGHTS  
ON THIS ONE MILE STRETCH OF ROAD NOT  
COUNTING THE STOP LIGHT AT WESTERN OR  
GAFFEY. THIS VERY RESIDENTIAL, 2 LANE URBAN  
STREET IS VERY HEAVILY USED BY RESIDENTS OF  
RPO GOING TO & FROM THE 110 FREEWAY. 1<sup>ST</sup> STREET  
MUST BE INCLUDED IN THE TRAFFIC ANALYSIS  
FOR LONG POINT.

Rowland Driskell

77E

4.5.2001

TO: DAVE SNOW  
RE. DRAFT E.I.R. LONG POINT  
FROM: Rowland Driskell  
30 Via Capri RPU CA 90275  
310 544 4183

TOTAL PAGES INCLUDING  
THIS COVER :

5

DAVE,

if you have any  
QUESTIONS - please call me  
cell 818.612.1767

Thanks

Rowland

RECEIVED

APR 05 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

**PUBLIC COMMENT FORM****PROJECT NAME:**Program Environmental Impact Report (EIR) for the Long Point Resort Project.**NAME AND ADDRESS OF COMMENTOR:** (include group or public agency affiliation, as applicable)Rowland 30 VIA CAPRI  
DRISKELL RPV CA 90275**Telephone Number:** 310.544.4183**COMMENTS:** John Schurict } KEITH Ehkert } Rich MARTIN  
310.541.5055 } 544.7606 } 310.217.1504

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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I AM VERY CONCERNED THAT THE ADDED  
WATER THAT IS ALWAYS REQUIRED FOR GOLF COURSES  
OR GOLF PRACTICE FACILITIES WOULD BE A SEVERE  
PROBLEM FOR THE FOUNDATIONS AT VILLA CAPRI  
IF THIS PROJECT WERE TO BECOME A REALITY.  
THE ISSUE OF "SLOPE STABILITY" IS NOT ADDRESSED  
AND MUST BE, IN MY OPINION, VILLA CAPRI JUST RECENTLY  
SPENT OVER \$3 MILLION DOLLARS ON CONSTRUCTION  
REMEDIAL REPAIRS (CONCRETE ADDED AT 49 HOMES WAS  
DONE TO DIVERT WATER FROM OUR FOUNDATIONS. IF WATER  
FROM THE PROPOSED GOLF ACTIVITIES UNDERMINES OUR  
FOUNDATIONS THEN THE CITY AND/OR DEVELOPER WOULD  
BE FINANCIALLY RESPONSIBLE TO REPAIR THIS AVOIDABLE  
SITUATION - AVOIDABLE BECAUSE THIS PASSIVE OPEN  
SPACE AT OUR PARK SHOULD NOT SUFFER FROM A  
CHANGE OF USE

Rowland Driskell

78A



**PUBLIC COMMENT FORM****PROJECT NAME:**

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

**NAME AND ADDRESS OF COMMENTOR:** (include group or public agency affiliation, as applicable)

Rowland 30 VIA CARRI  
DRISKELL RPV CA 90275

**Telephone Number:** 310.544.4183

**COMMENTS:**

Golf Safety -

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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THE D.E.I.R. USES (ADMITTEDLY) OUTDATED GOLF  
SAFETY GUIDELINES OF THE 1960's & 1970's  
WHILE DESIGNING THE PROPOSED GOLFING ACTIVITIES  
IN THE PROPOSED RESORT / GOLF PROJECT.

THIS IS WRONG !!

THE ONLY SUCCESSFUL GOLF PROJECTS BUILT  
ADJACENT TO RESIDENTIAL AREAS ARE THOSE  
THAT ARE BUILT CONCURRENTLY. IN THAT WAY  
THE TWO ENTITIES CAN BE DESIGNED TO  
BE SAFE FOR ALL CONCERNED AND  
IN HARMONY WITH EACH OTHER.

THE DESIGN DISCUSSED IN THE D.E.I.R. IS  
POORLY CONCEIVED & PARTLY DUE TO THE  
ABSOLUTE INABILITY TO APPEASE RESIDENTIAL  
& GOLFERS SAFETY IN THE SAME SMALL AREA.

THE GOLF SAFETY EXPERT, KIPP SCHULTZ, HAS  
REPEATEDLY CAUTIONED ALL WHO READ HIS DOCUMENT  
THAT HE IS BEING ASKED TO ACCOMPLISH THAT WHICH  
IS IMPOSSIBLE.

78B

**PUBLIC COMMENT FORM****PROJECT NAME:**

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

**NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)**

Rowland 30 VIA CAPRI  
DRISKELL RPV CA 90275

Telephone Number: 310.544.4183

COMMENTS: GOLF SAFETY - NETS

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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IF THE PROPOSED GOLFING ACTIVITIES ARE APPROVED & BUILT ADJACENT TO THE 49 HOMES OF VILLA CAPRI, ST. PAUL'S LUTHERAN CHURCH, & THE MANY STORES OF GOLDEN CAVE - THE NEED (REQUIREMENT) FOR GOLF NETS WOULD BE OBVIOUS AND PRUDENT TO PROTECT RESIDENTS & PROPERTY.

THERE ARE DOCUMENTED INCIDENTS OF GOLF BALLS HITTING HOMES OF VILLA CAPRI FROM LOS VERDES GOLF COURSE AND GOLF ACTIVITIES ADJACENT TO VILLA CAPRI WOULD CERTAINLY BE EVEN MORE DANGEROUS.

IF THIS GOLF PROJECT WERE TO PROCEED & GOLF NETS HAD TO BE CREATED, THEN THE CITY OF RPV AND/OR THE LONG POINT DEVELOPER WOULD BE DIRECTLY FINANCIALLY RESPONSIBLE FOR THE SUBSEQUENT LOSS OF VALUE TO OUR HOMES - RESTAURANTS & STORES. OUR LOSS OF OCEAN VIEWS WOULD ALSO RESULT IN OUR HOMES/BUSINESSES DEPRECIATING IN VALUE.

THE ISSUE OF GOLF NETS IS NOT CONSIDERED IN THE DRAFT EIR & MUST BE ADDRESSED.

Rowland Driskell

78C

**PUBLIC COMMENT FORM****PROJECT NAME:**

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

**NAME AND ADDRESS OF COMMENTOR:** (include group or public agency affiliation, as applicable)

Rowland 30 VIA CAPRI  
DRISKELL RPV CA 90275

**Telephone Number:** 310.544.4183

**COMMENTS:**

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THE ENTIRE CONCEPT OF VALUES USED BY  
THIS E.I.R. IS BASED ON SITUATIONS &  
PAST EXPERIENCES OF OTHER COMMUNITIES  
THAT ARE VASTLY DIFFERENT FROM RANCHO  
PALOS VERDES. MITIGATION THAT RELIEVES  
A TROUBLE SOME SITUATION IN A CITY WITH HIGH-  
DENSITY POPULATION WILL NOT SATISFY THE  
REQUIREMENTS & NEEDS OF THE CITIZENS OF  
RANCHO PALOS VERDES WHICH IS A LOW-DENSITY  
RESIDENTIAL COMMUNITY. A DIFFERENT SET OF VALUES  
MUST BE USED BY THE PREPARER OF THIS EIR.  
THE CURRENT MITIGATIONS ARE NOT ACCEPTABLE TO ME AND  
THE OVERWHELMING MAJORITY OF HOMEOWNERS ADVERSELY  
AFFECTED BY THIS PROPOSED PROJECT

78D

Rowland Driskell

Page 1 of 2

4.6.2001

## PUBLIC COMMENT FORM

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

RECEIVED

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell  
 & FAMILY  
 30 VIA CAPRI  
 RPU CA 90275

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Telephone Number: 310.544.4183

## COMMENTS:

NO NOISE, PLEASE!

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

To: This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

MY FAMILY & I LIVED ON VALLON DRIVE FOR 34 YEARS - DIRECTLY ADJACENT TO THE 18 HOLE GOLF COURSE - LOS VERDES - ON THE 14TH FAIRWAY. FOR 34 YEARS WE ENDURED EARLY (6am) GOLFERS AND THEIR ERRANT GOLF SHOTS. WE HAD 2 WINDOWS BROKEN AND ROUTINELY FOUND GOLF BALLS HITTING OUR HOME. WE LOOKED FOR ANOTHER, MORE PEACEFUL HOME. WE FOUND A VERY PEACEFUL & QUIET HOME AT 30 VIA CAPRI - RPU WHICH WAS DIRECTLY ADJACENT TO UPPER POINT VICENTE PARK - THE LOWER PART OF THE PARK WHICH IS A PASSIVE OPEN SPACE. WE RESEARCHED THE PARK'S HISTORY AND WITH THE HELP OF OUR REALTOR DISCOVERED THE PARK WAS DEEDDED TO THE CITY AND THE PASSIVE PORTION OF THE PARK WAS MANDATED LEGALLY TO REMAIN PASSIVE. ANY PROPOSED CHANGE OF USE WOULD RESULT IN OUR LOSS (AND OUR NEIGHBORS LOSS) OF THE PEACE & QUIET WE NOW ENJOY. OUR TRANQUILITY IS PROTECTED BY LAW & IT MUST BE PRESERVED, IT CANNOT BE MITIGATED!!!

79A

Rowland Driskell

## PUBLIC COMMENT FORM

Page 2 of 2

4.6.2001

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

RECEIVED

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable) APR 06 2001

Rowland  
 DRISKELL  
 & FAMILY  
 30 VIA CAPRI  
 RPV CA 90275

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Telephone Number: 310.544.4183

## COMMENTS:

NO LOSS OF PRIVACY DUE TO ANY  
 GOLFING ACTIVITIES

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

TO: This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

THE PRIVACY WE AND OUR 16 NEIGHBORS NOW  
 ENJOY MUST NOT BE YIELDED OR CONCEDED TO  
 A PRIVATE DEVELOPER.

ALL PROPOSED GOLF ACTIVITIES (WHETHER 1 HOLE OF GOLF  
 2 HOLES OF GOLF OR PRACTICE RANGE)  
 ARE UNACCEPTABLE -

17 HOMES ARE DIRECTLY ADJACENT TO THE  
 EXISTING - PASSIVE - OPEN SPACE  
 PARKLAND OF UPPER POINT VICENTE &  
 BY LAW MUST STAY AS IT IS.

PROPOSED FOOTPATHS ARE ALSO UNACCEPTABLE -

MY BED IS 10 FEET FROM MY FENCE LINE  
 & THERE IS NO EASEMENT.

THIS ISSUE CANNOT BE RELIEVED/MITIGATED.

Rowland Driskell

79B

## PUBLIC COMMENT FORM

Page 1

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell  
30 VIA CAPE  
RPN CA 90275

Telephone Number: 310.544 4183

4.6.2001

## COMMENTS:

GOLF SAFETY

Kipp Schulties - Golf Design Commentor

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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I SPOKE TO KIPP SCHULTIES TODAY. KIPP INFORMS ME HE HAS HAD NO CONTACT REGARDING THIS PROJECT SINCE HE WROTE HIS COMMENTS ON 1.23.2001

SINCE THE GOLF COURSE LAYOUT HAS CONTINUED TO CHANGE WHO IS REVIEWING & COMMENTING ON NEW LAYOUTS???

KIPP WAS VERY SURPRISED TO HEAR THE GOLF PRACTICE FACILITY WOULD NOT BE PLACED ADJACENT TO VILLA CAPE, IF THE PROPOSED CONCESSION IS APPROVED.

I'M SURE THE DEVELOPER IS AWARE THAT HAVING THE PRACTICE FACILITY NEXT TO THE 9TH HOLE WOULD BE VERY DANGEROUS TO GOLFERS AT THAT HOLE.

WHO IS TO REVIEW THIS PROPOSED GOLF PROJECT? DESIGN COMMENTOR? GOLF ARCHITECT? INSURANCE UNDERWRITER?

Rowland Driskell

80A

## PUBLIC COMMENT FORM

4.6.2001

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

## NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

ROWLAND DRISKELL

30 VIA CARPI

RIV LA 90275

WE ARE AGAINST  
ANY GOLF ACTIVITY  
ON PUBLIC PARKLAND

Telephone Number: 310.544.4183

## COMMENTS:

NATIVE HABITAT VS. GOLF LAYOUT

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

GOLF SAFETY WAS REVIEWED & COMMENTED ON  
BY KIPP SCHULTIES BUT,

WHERE IN THE DRAFT E.I.R. ARE EXPERTS'  
COMMENTS ON THE CURRENT GOLF LAYOUT  
AND HOW THIS PROPOSED GOLF LAYOUT  
MEETS THE REQUIREMENTS OF SUCCESSFUL  
NATIVE HABITAT & VEGETATION?

THIS IS A VERY IMPORTANT ANALYSIS THAT  
IS MISSING FROM THIS DRAFT

WITHOUT THIS ANALYSIS (AND A FAVORABLE REPORT)  
THE PROPOSED GOLF PROJECT LAYOUT IS  
SUSPECT AND THE DEVELOPERS  
TRUE DEDICATION TO MAINTAINING & PRESERVING  
NATIVE SPECIES IS QUESTIONABLE.

Rowland Driskell

81A

## PUBLIC COMMENT FORM

4.6.2001

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

ROWLAND DRISKELL  
30 VIA CARRI  
RPN CA 90275WE ARE  
AGAINST ANY  
GOLFING  
ACTIVITIES ON  
PUBLIC PARKLAND

Telephone Number: 310.544.4183

NATIVE HABITAT VS. GOLF LAYOUT

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

NO WHERE DO I SEE ANY  
ALLOWANCE IN KIPP SCHULTIES  
GOLF REVIEW WITH RESPECT TO  
THE ALL IMPORTANT NATIVE HABITAT

IT DOES NOT APPEAR THAT MR. SCHULTIES  
RECEIVED PROPER INSTRUCTION TO INCLUDE  
LOCATION AND PLACEMENT OF NATIVE  
VEGETATION AS AN ELEMENT TO CONSIDER  
AND COMMENT ON.

DUE TO THE FRAGILE NATURE OF REVEGETATED  
NATIVE VEGETATION - IT WOULD BE  
PARAMOUNT FOR GOLF EXPERT COMMENTOR  
TO ALLOW FOR GOLF LAYOUT & ITS IMPACT  
ON ERRANT SHOTS INTO THIS VEGETATION &  
HOW GOLFING ACTIVITIES WOULD SCARE  
AWAY NATIVE SPECIES (GNAT-CATCHER ETC)

82A



## PUBLIC COMMENT FORM

4.6.2001

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

ROWLAND DRISKELL

30 VIA CAPRI

RPN CA 90275

Telephone Number: 310.544.4183

WE ARE AGAINST ANY  
GOLF ON PUBLIC, PASSIVE  
PARKLAND

## COMMENTS:

GOLF SAFETY - PROPOSED holes #3 &amp; #4

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

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SOURCE: IN APPENDIX - NICKLAUS DESIGN

MINIMUM DIMENSIONS FOR A DOUBLE - FAIRWAY  
GOLF CORRIDOR INDICATE AT LEAST 570 TO 620 FEET  
HOWEVER, THE DISTANCE BETWEEN VILLA CAPRI HOMES  
AND THE STEEP SLOPE NORTH OF THE RPN COMMUNITY  
BUILDING IS LESS THAN MINIMUM SAFE DISTANCE.

-ALSO-

THESE MINIMUM SAFETY GUIDELINES ARE FOR:

- 1) A WINDLESS SITE
  - 2) ON FLAT TOPOGRAPHY
- "OTHER CONDITIONS REQUIRE ADDITIONAL CLEARANCES"

- 1) BEING VERY CLOSE TO THE OCEAN WE CONSISTENTLY  
EXPERIENCE MILD TO STRONG WESTERLY PREVAILING  
WIND - WHICH WOULD "PUSH" TEE SHOTS &  
2ND/ SHOTS ON THE 3rd hole TOWARD THE HOMES  
OF VILLA CAPRI

- 2) THE OPEN, PASSIVE PARKLAND ADJACENT TO VILLA CAPRI  
HAS A DEFINITE SLOPING TOPOGRAPHY - NOT FLAT  
IF THE D.E.I.R. HAD A GOLF ARCHITECT - MAYBE THE  
ARCHITECT COULD TELL THE DEVELOPER WHAT ADDITIONAL  
SAFETY CLEARANCES WOULD BE REQUIRED.

AS YOU CAN SEE THE DRAFT E.I.R. HAS CREATED A  
VERY UNSAFE GOLFING PROPOSAL.

R. Diabell

83A

## PUBLIC COMMENT FORM

## PROJECT NAME:

4-6-01

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

## NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland Driskell  
 30 VIA CAPRI  
 RANCHO PALOS VERDES CA 90275

Telephone Number: 310 544 4183

SEVERAL REASONS THE D.E.I.R.  
 COMMENTS: IS NOT ACCURATE & OBJECTIVE

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

## THIS COVER SHEET

2 PAGES - PROPOSED IMPROVEMENTS TO RANCHO PALOS VERDES CITY YARD & UPPER POINT VICENTE PARK	84A
2 PAGES - HAWTHORNE BLVD @ PALOS VERDES SOUTH TRAFFIC INCREASE	84B
1 PAGES - TRAFFIC ANALYSIS OF 1ST STREET IN SAN PEDRO BETWEEN GAFFNEY & WESTERN NOT DISCUSSED IN D.E.I.R.	84C
3 PAGES - MAP OF COASTLINE WITH ADDED STOP LIGHTS IF LONG POINT WERE TO BE BUILT 2 PAGE SUMMARY OF TRAFFIC ANALYSIS	84D
1 PAGES - DAILY BREEZE EDITORIAL - READERS Comments	84E

10 TOTAL PAGES

from Rowland Driskell

## PROPOSED IMPROVEMENTS FOR RPV CITY YARD

- \$ 0 A. CONCRETE / ASPHALT DECK - CLEAN IT UP  
CONSOLIDATE OPERATIONS TO SEAWARD  
SIDE OF YARD. KEEP ALL TRUCKS, TRAILERS,  
DUMPSTERS, TREE TRIMMING EQUIPMENT,  
CARS etc. TO THE WEST END OF THE YARD.
- \$ 0 B. NO TRUCKS / EQUIPMENT BY HELIPAD OR AT  
THE ENTRANCE TO CITY HALL AREA.
- \$ 0 C. COX CABLE AREA - KEEP IT CLEAN
- \$ 750 D. PAINT METAL STORAGE BUILDING GREEN  
SO THAT IT BLENDS INTO SURROUNDINGS
- \$ 400 E. DEMO GUARD SHACK
- \$ 300 F. DEMO KENNELS
- \$ 0 G. CONVINCE TREE TRIMMING COMPANY TO  
DONATE ONE 40 YARD DUMPSTER FOR CITY  
YARD CLEANUP EFFORTS
- \$ ? H. PLANT SHRUBS / SMALL TREES AROUND  
BUILDINGS AND STAGING AREAS TO  
BEAUTIFY AREA
- \$ ? I. WOULD IT BE POSSIBLE / FEASIBLE TO ERECT  
1 OR 2 TENNIS COURTS ON EXISTING  
CONCRETE ? USE FLAT VACANT AREA  
BETWEEN HELIPAD AND TENNIS COMPLEX  
FOR A YOUTH SOCCER FIELD?

84A

FREE!

4 LARGE PALMS

4 small PALMS

### ADMIN AREA

- \$ 500 A. INSTALL 4 PARK BENCHES AND TRASH CAN AT  
SCENIC OVERLOOK
- \$ 400 B. 125 FOOT LONG TRAIL FOR  
ACCESS TO PARK BENCHES
- \$5000 C. PLANT 30 ITALIAN CYPRESS TREES  
SITUATED BETWEEN THE WINDOWS  
OF THE COMMUNITY CENTER BUILDING  
ON NORTH AND WEST SIDES
- \$ 0 D. TALK TO COAST GUARD ABOUT REMOVING  
WOODEN ANTENNAE THAT IS NOT IN USE

Boy Scout  
Projectsubmit plan to  
Dept. of Public  
works

NTX \$ 7350

CITY OF RPV.

UPPER POINT VICENTE PARK

3.17.2001

Rowland Driskell

PROPOSED IMPROVEMENTS TO UPPER POINT  
VICENTE PARK

CITY OF RPV

UPPER POINT VICENTE PARK

3.17.2001

KEEP CITY YARD AREA NEAT, CLEAN AND ORGANIZED. TOURISTS IN THE GOODYEAR BLIMP AND THE HOMEOWNERS OF LA CRESTA LOOK DOWN ON THIS AREA. CITY VEHICLES AND TREE TRIMMING OPERATIONS WITH DUMPSTERS COULD BE KEPT TO THE WEST END OF YARD. PAINTING THE METAL STORAGE BUILDING GREEN (ROOF INCLUDED), PLANTING TREES AND SHRUBS AROUND THIS AREA WOULD ALSO HELP TO BEAUTIFY THE CITY YARD. I AM STARTING A REMODEL JOB NEXT WEEK WHERE THERE ARE THREE SMALL PALM TREES AND TWO LARGE PALM TREES, FREE FOR THE TAKING. THE SALVAGE BELONGS TO ME AND I WOULD GLADLY DONATE THESE TO BEAUTIFY THE CITY YARD AREA.

THE IDEA OF TENNIS COURTS AND YOUTH SOCCER FIELD SHOULD NOT REQUIRE ALTERING THE CITY'S GENERAL PLAN. IF THIS IS A PROBLEM, THEN FORGET IT. BUT, I FEEL THESE TWO IDEAS WOULD COMPLIMENT THE NEARBY ROBERT RYAN PARK.

SOC II HAS A LARGE NETWORK OF VOLUNTEER GROUPS WHO WOULD DONATE THEIR EFFORTS TO KEEP COSTS AT A MINIMUM AND PROMOTE CIVIC PRIDE.

THE PARK BENCHES WOULD BE A WELCOMED ADDITION TO THE UPPER POINT VICENTE PARK. NOT ONLY WOULD RESIDENTS ENJOY THESE BUT CITY EMPLOYEES TOO. LUNCH BREAK, etc.

COMMUNITY BLDG. WOULD BE SO MUCH MORE ATTRACTIVE WITH EVERGREEN TREES AROUND IT, BEING CAREFUL NOT TO OBSTRUCT CITY EMPLOYEES' VIEWS

THESE ARE A FEW IDEAS THAT WOULD NOT COST TOO MUCH AND YET WOULD MAKE THE UPPER PART OF THIS PARK MORE ATTRACTIVE. I WOULD HOPE THE CITY STAFF AND CITY EMPLOYEES WOULD EMBRACE THE IDEA OF MAKING THESE SURROUNDINGS MORE PLEASING TO THE EYE.

ALL ACTIVE RECREATIONAL ACTIVITIES MUST BE SITUATED AT THE "UPPER" PART OF UPVPARK. THE LOWER AREAS TO THE NORTH, WEST AND SOUTH MUST REMAIN PASSIVE PARKLAND. THIS WOULD SEND A MESSAGE TO GOVERNMENTAL AGENCIES THAT THIS CITY IS VERY SERIOUS ABOUT DEVELOPING A SOLID, SINCERE NCCP PLAN.

KEEPING THE OPEN FIELD ADJACENT TO THE VILLA CAPRI COMPLEX AND SAINT PAUL'S LUTHERAN CHURCH AS A PASSIVE OPEN SPACE AREA WOULD BE IN TUNE WITH THE ARDENT WISHES OF RESIDENTS AND CHURCH MEMBERS ALIKE. PLEASE CONTACT ROWLAND DRISKELL @ 310.544.4183 REGARDING 42 OF 47 RESIDENTS WHO HAVE SIGNED THE SOC II PETITION REGARDING KEEPING THIS OPEN SPACE IN ITS PRESENT, PASSIVE STATE. JOSEPH J. PICARELLI, SPOKESMAN FOR SAINT PAULS CHURCH, CAN BE REACHED AT 310.544.2455. THE CHURCH MEMBERS HAVE ALSO SIGNED THE SOC II PETITION TO MAINTAIN THE PARK IN ITS PRESENT, PASSIVE STATE.

I AM AVAILABLE TO DISCUSS THESE IDEAS WITH CITY COUNCIL AND THE PARK DEPT.  
SINCERELY,

ROWLAND DRISKELL  
30 VIA CAPRI RPV. CA. 90275  
310.544.4183

Rowland Driskell

HAND Delivered 3/28 4:15pm - TO NANCY - RPV CITY HALL

84A

PUDRIVE WEST

MAJOR NEGATIVE  
IMPACT ON CITY  
IF LONG POINT  
WERE TO BE BUILT

NOW

LATER

ADD

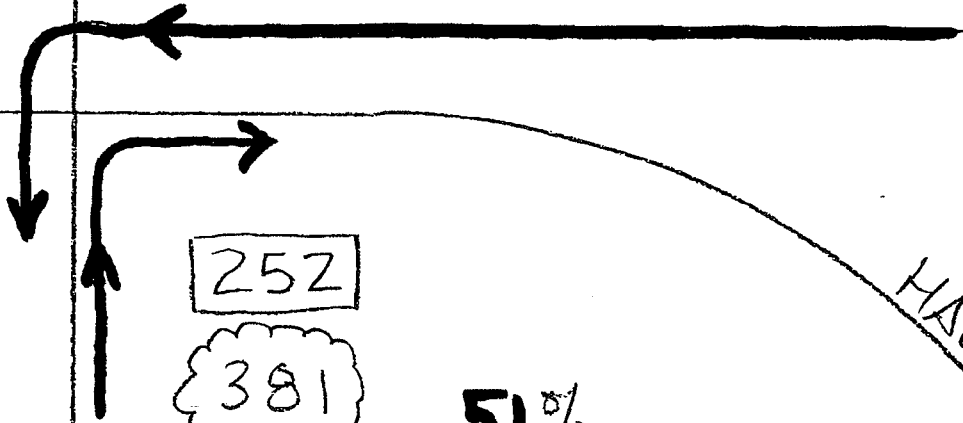
270

397

127

+ 47%

84B



252

381

+ 129

51%  
MORE  
~~ASTER~~ IF  
DEVELOPMENT  
WERE TO BE  
BUILT

HAWTHORNE

TO LONG POINT

PUDRIVE SOUTH

Rowland Driskell  
38 VIA CARPI RPV  
544 4183

PER E.I.R. LONG POINT  
TRAFFIC IMPACT ANALYSIS  
(PREPARED BY DEVELOPER)

IF LONG POINT WERE BUILT:  
Then;

TRAFFIC AT "A" WOULD INCREASE  
51%

TRAFFIC AT "B" WOULD INCREASE  
47%

VIA RIVERA  
LEFT TURN  
UP HAWTHORNE  
MANY  
WRECK'S

CPH  
HOMES

1A  
VICENTE

C.H.  
ESTATES

McGraw's

PV  
DRIVE  
WEST

PV  
DRIVE  
SOUTH

To:  
LONG  
POINT

HAWTHORNE  
BLVD

84B

76

GOLDEN  
COVE  
CENTER

MONTESSORI  
SCHOOL - 400  
STUDENTS -  
800 TRIPS  
DAILY

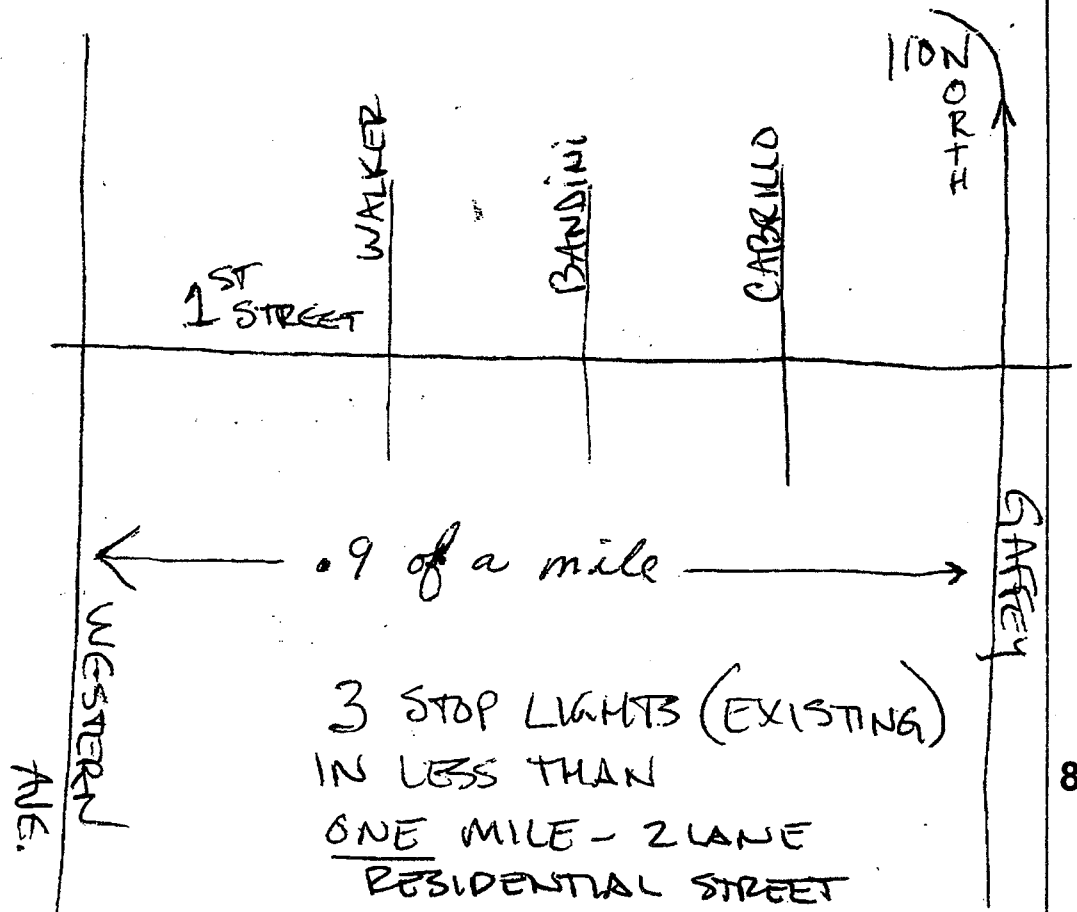
49  
HOMES OF  
VILLA  
CAPRI

NOTE: THESE FIGURES WERE  
FROM URBAN CROSSROADS  
AND REPRESENT PEAK P.M.  
TRAFFIC DENSITY - THERE ARE  
SEVERAL OTHER INTERSECTIONS  
THAT ALSO BE ADVERSELY  
AFFECTED - LOS (LEVEL OF SERVICE)  
E & F

Roseland Driskell  
310 544 4183

(DRAWN BY R. DRISKELL)

"The Hill" should remain  
low-density residential,  
in my opinion



84C

This is NOT  
shown on D.E.T.R.  
& should be  
because this .9  
mile route is  
used by many  
who live on hill  
& go to 110 NORTH

24-7  
PAC  
4522  
818 372

Rowland Drake

MALAGA  
COVE

8

S

STIP - ZERO  
5.414

3.4

8  
9  
8

STOP LIGHT  
(LYOTING)

S

START ZERO

X

PROPOSED  
STOP LIGHT

E

END (11.7 m)

RE  
POINT

SEA 2.4

SEA 2.4

SEA CORONEL

PARAD LUGADO

LOS VERDES  
18 HINE  
GOLF

STAN  
PARK

BLVD.

DUPRE

HAWTHORNE

CREST ROAD

VALDES VERDE U EAST

8

5.4

X

Point  
Vicente  
Lighthouse

LONG  
POINT

Portuguese Point

Inspiration Point

9.8

10.4

ANCHORAGE

E

CALIFORNIA

84D



Rowland Driskell

## COASTLINE TRAFFIC ON THE HILL

30 VIA LAPRI RPU 5444183

WE ARE ABOUT TO LOOSE ONE OF OUR  
GRANDEST ASSETS - A PEACEFUL DRIVE ALONG  
OUR COASTLINE. There is CURRENTLY ONE  
STOP LIGHT BETWEEN THE CALLE MAYOR  
STOP LIGHT ON PV BLVD IN TORRANCE AND  
THE LIGHT AT ANCHOVY & PV DRIVE SOUTH  
IN SAN PEDRO - that would be the stop light  
AT HAWTHORNE & PVDW/SOUTH. Right now  
you can enjoy a  $1\frac{1}{2}$  mile drive by  
the coastline with only ONE STOP LIGHT.

84D

AT THE TRAFFIC ADVISORY COMMITTEE MEETING  
OF RPU ON 3/26/2001 IT WAS MENTIONED  
there could quite possibly be 4 STOP LIGHTS  
ADDED BETWEEN HAWTHORNE BLVD &  
ANCHOVY, SOON.

- a. Entrance to Long Point Resort
- b. Entrance to Ocean Trails
- c. PVDrive S @ PV Drive EAST
- d. PVDrive S @ Rotunda.

THE CITY OF RPU WAS FOUNDED ON THE PRINCIPLES  
OF: LOW-DENSITY LAND USE AND RESPONSIVENESS TO  
ITS CITIZENS. THE TRAFFIC COMMISSION USES A  
FORMULA OF 10 daily trips per household. The  
Long Point Resorts calculation is 6362 trips  
per day. I PROPOSE LONG POINT RE-THINK THEIR

DEVELOPMENT PLAN - GO RESIDENTIAL.  
CPH HOMES HAS 132 ACRES & PLAN 79 HOMES.  
LONG POINT HAS 102 ACRES & COULD BUILD  
62 HOMES, WITH THE SAME SIZE LOTS &  
NATIVE HABITAT & BLUFF WALKING TRAILS.  
THE NET EFFECT ON TRAFFIC WOULD BE:  
COMMERCIAL DEVELOPMENT 6362 TRIPS PER DAY  
VERSUS 620 TRIPS PER DAY IF DEVELOPED  
AS A RESIDENTIAL PROJECT.

SOME OF THE BENEFITS WOULD BE:

1. SAVE OUR PARK & MAINTAIN A STRONG HABITAT POSITION SO WE COULD QUALIFY FOR FUNDS TO BUY MORE OPEN SPACE (NCCP)
2. LESS TRAFFIC - NO STOP LIGHTS
3. A FEASIBLE PROJECT ABLE TO SECURE FINANCING
4. OTHER EXISTING GOLF COURSES COULD BE MORE FULLY UTILIZED
5. NO "TUNNEL" UNDER PV DRIVE SOUTH
6. RPV WOULD AVOID "PARTNERSHIP" WITH PRIVATE DEVELOPER - LESS EXPOSURE

84D

Rowland Driskell  
30 VIA CAPRI RPV CA 90275  
310 544 4183

## Most Villa Capri residents don't support golf course

I must dispute the comments made by Paul Payne at the Rancho Palos Verdes Planning Commission meeting March 13 at Hesse Park.

Payne presented himself as the president of the Home Owners Association of Villa Capri, the only residential development that exists adjacent to the Upper Point Vicente

Park, a total of 49 homes. Payne indicated that the residents of Villa Capri support the Long Point Resort golfing activities at our park.

This is NOT what 41 of 46 residents support; 41 residents signed their names supporting the Save Our Coastline II petition, which urges "the City Council to retain all public land for general public use or open space."

Payne was the 19th resident to sign this petition. Payne was kept informed of my progress and success in having our neighbors sign the SOC II petition. In addition, Payne spoke at the Jan. 16 RPV City Council meeting when he informed the council that a majority of residents of Villa Capri, including himself, were against golfing at our park. I continued to circulate the petition, gaining even more support to Save Our Park. I purposely petitioned residents I knew were for the golf project, in order to be fair and poll ALL of the residents of Villa Capri.

Why would the president of a HOA go on record against the recorded wishes of 90 percent of the residents he represents? I have enclosed three pages of residents' signatures supporting SOC II petition. I will circulate this letter for my neighbors to sign to prove that the overwhelming majority of residents of Villa Capri do not support any golfing at Upper Point Vicente Park.

I submit this letter to the editor, the RPV Planning Commission and the RPV City Council, with the residents' signatures, to "set the record straight."

— ROWLAND DRISKELL

Rancho Palos Verdes

Rowland Driskell  
30 VIA CAPRI RPU

NOW  
42  
of  
47

AS  
SEEN  
IN  
The Daily  
Breeze

84E

310.  
544 4183

Page 1

## PUBLIC COMMENT FORM

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland  
 DRISKELL 30 VIA CARR.  
 RPN CA 90275

Telephone Number: 310.544.4153 4.6.2001

## COMMENTS:

GOLF SAFETY

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

per Golf Safety documents - John B. Miles

"INCLUDE AN INSURANCE UNDERWRITER  
 AS A MEMBER OF THE DEVELOPMENT TEAM"

WHERE IN THE D.E.I.R. DOES IT MENTION  
 WHO THE PROPOSED INSURANCE CARRIER IS.

THE POTENTIAL LITIGATION AGAINST THE  
 CITY OF RPN DUE TO POOR PLANNING  
 OF THIS PROPOSED GOLF COURSE IS ALMOST  
 A CERTAINITY.

WHERE IS THE GOLF COURSE ARCHITECT'S  
 COMMENTS & RECOMMENDATIONS ??

WHERE IS THE INSURANCE UNDERWRITER'S  
 COMMENTS & ASSURANCES THAT HIS INSURANCE  
 COMPANY WOULD UNDERWRITE THE  
 PROPOSED COURSE ???

AGAIN - A FLAWED DRAFT E.I.R.

Rowland Driskell

85A

## PUBLIC COMMENT FORM

Page 2

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland 30 VIA CARR.  
 DRISKELL RIV CA 90275

Telephone Number: 310.544.4183 4.6.2001

COMMENTS: RE: Kipp Schulties letter to Rita Garcia  
 of RBF Consulting 11.5.2000

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

TD:

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

GOLF SAFETY - IS COMPROMISED IN ANY PROPOSED  
 LAYOUT OF GOLF HOLES & PRACTICE FACILITY

SEE NOTE FOR HOLE #3  
 RE K. Schulties " THAT IS REALLY UNACCEPTABLE  
 USING TODAY'S GUIDELINES FOR  
 GOLF CORRIDOR WIDTHS "

WHAT SAFETY GUIDELINES ARE USED FOR  
 THIS PROPOSED COURSE - ???

CURRENT SAFETY GUIDELINES OR  
 LESS SAFE GUIDELINES FROM THE 1960's &  
 1970's ??

GOLF BALLS TRAVEL UP TO 170 MILES PER HOUR  
 THE SPEED & IMPACT OF A SHOTGUN BLAST

MITIGATION OF RESIDENTS SAFETY, OTHER  
 GOLFERS SAFETY & PERSONS DRIVING OUR  
 CITY STREETS IS NOT A LIGHT HEARTED  
 ISSUE - BE SERIOUS ABOUT EVERYONES SAFETY -  
 TELL LONG POINT TO SHUTLE GOLFERS TO A "REAL"  
 GOLF COURSE - LIKE THE 18 HOLE COURSES OF  
 OCEAN TRAILS OR LOS VERDES !!!

85B

Page 3

## PUBLIC COMMENT FORM

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Rowland 30 VIA CARRI  
DRISKELL RPV CA 90275

Telephone Number: 310.544.4183 4.6.2001

## COMMENTS:

Re Golf safety info found in  
D.E.I.R. appendices

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

"LARGELY BECAUSE OF LEGAL IMPLICATIONS, PROFESSIONALS AND THEIR ATTENDANT ORGANIZATIONS HAVE BEEN RELUCTANT TO ADOPT ANY SPECIFIC WRITTEN CRITERIA FOR GOLF COURSE SAFETY CORRIDORS. THE OFFICIAL APPROACH OF THE AMERICAN SOCIETY OF GOLF COURSE ARCHITECTS (ASGCA) IS VERBAL AND VERY GENERAL, AND STRONGLY EMPHASIZES SITE-SPECIFIC CRITERIA.

85C

THE PRUDENT COURSE OF ACTION IS TO CONTRACT WITH AN EXPERIENCED, REPUTABLE GOLF COURSE ARCHITECT EARLY DURING THE PLANNING PROCESS."

→ WHERE IS THE GOLF ARCHITECTS INPUT & COMMENTS ??  
THE DRAFT E.I.R. IS SERIOUSLY LACKING IN QUALIFIED ARCHITECTURAL INPUT & DESIGN.

Rowland Driskell

**Jeff Duncan, 03:42 PM 3/13/01 -0800, Comments regarding Long Point project and draft EIR**

---

Subject: Comments regarding Long Point project and draft EIR

Date: Tue, 13 Mar 2001 15:42:00 -0800

X-MS-Has-Attach:

X-MS-TNEF-Correlator:

Thread-Topic: Comments regarding Long Point project and draft EIR

Thread-Index: AcCsF3spu1Dp9heMEdWBdwBQ2lodxw==

Priority: Urgent

Importance: high

From: "Jeff Duncan" <Jeff.Duncan@Magtek.com>

To: <citycouncil@rpv.com>, <planning@rpv.com>

X-MIME-Autoconverted: from quoted-printable to 8bit by faxmail.rpv.com id PAA00391

To all:

Specifically -

1. I am against the use of city land for the Long Point golf course.

**86A**

For the project as a whole -

2. In review of the draft E.I.R - traffic and the noise generated from it is a definite problem that will seriously degrade the overall environment of RPV as a residential community. I don't think any comments in the EIR go towards resolving this issue at all.

**86B**

3. The EIR totally neglects to mention PV Drive South in the Portuguese Bend area and how a large percentage of the construction traffic as well as the 50% of the long term traffic will surely add significantly more wear and tear to this stretch of road. The City Council keeps complaining about the money required to continually fix this road now. Surely the extra impact of this project will increase these costs. I hope that the planning dept. has included this factor in as an offset to any projected revenue from this development.

**86C**

Thanks,  
Jeff Duncan  
57 Limetree Ln  
RPV

April 1, 2001

Mayor Lyon  
Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: The Long Point Resort

Dear Mayor, Members of the City Council and Planning Commissioners:

We are writing on behalf of our family, and specifically our 11 year-old daughter, a member of the Palos Verdes Peninsula Girls Softball League (PVPGSL).

For two years, our daughter has enjoyed the camaraderie and challenge of playing in a sports league that stresses skill building, sportsmanship and achievement. We would like for all of our extended family to see her participate in this sport, however, the severely lacking facilities in which she participates precludes her grandmother from attending due to the extreme difficulty in parking and walking to the site. As you may be aware, the current softball fields are undersized, makeshift fields with inadequate spectator space, restroom facilities and parking. The orientation of these fields also makes them very difficult for our girls to play on. The insufficiency of our PVPGSL playing field facilities was strongly brought to our attention this past summer when our daughter had the opportunity to travel to sites in Torrance, Orange county and Riverside county to play softball. The enormous discrepancy between the park-like fields these girls play on versus the fields the girls of Palos Verdes play on was greatly evident.

In our view the strength of the community of Palos Verdes has always been based on its' leader's commitment to the families that live here. In accordance with that great tradition, we would like to request that the proposed 4 softball fields for the Long Point property are strongly considered as the best option for this land. Indeed, it would be a great addition to the recreational opportunities offered to the children of Palos Verdes. It would support the families of this community in their quest to provide enriching and growing experiences for their children. It would improve the opportunity for the hundreds of girls who currently participate in the PVPGSL, and would open up the opportunity for hundreds more who would play if the field conditions were to improve. The addition of 4 beautiful regulation softball fields would be a visual demonstration to visitors to the peninsula of the commitment of this community to it's families and it's youth.

We thank you for the opportunity to express our views.

Respectfully submitted,

Brentt and Erin Eads  
28635 Hazelridge Drive  
Rancho Palos Verdes, CA 90245  
(310) 377-0902

87A



RECEIVED

MAR 07 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

To City of Rancho Palos Verdes

Planning Commission, Attn: Dave Snow

This letter is to inform you that my wife and I are opposed to the City of RPV transferring the use of ANY city property to the Long Point Development.

We do not believe that a developer should benefit from redesignation of public park open space for his own profit.

Open space public land does not remain available to the public or the wildlife, as a private or public golf course.

York could utilize the private open space land on the Capital Pacific Holding development as per the original 18 hole golf proposal. He could also purchase the other 29 homes sites at the south end of Ocean Front, C.P.H., for his golf course.

York could make a deal with Ocean Trails to utilize their 18 hole course for his resort hotel.

We, also believe that fairways adjacent to Palos Verdes Drive, South represent a significant hazard to traffic and would ultimately require UGLY NET screening.

88A

88B

Sincerely,

Alfred J. and Deanne L. Edridge

*Alfred J. Edridge* 2/7/01  
*Deanne L. Edridge* 2-7-01

30945 Rue De La Pierre  
 Rancho Palos Verdes Ca. 90275

310 541 8746

From: "Emon, Akhtar" <EMONAK@mail.northgrum.com>  
To: "CityCouncil@RPV.Com" <CityCouncil@RPV.Com>  
Subject: RPV City needs a Community Center (Public Input).  
Date: Mon, 12 Feb 2001 15:10:01 -0800  
Importance: high  
X-Mailer: Internet Mail Service (5.5.2650.21)

To: Council Members,  
2-12-01

> RPV City Hall,

>

> Dear Council Members,

>

> I am submitting the following letter for the consideration by RPV City  
> Council.

>

>

> SUBJECT: RPV City needs a Community Center (Public Input).

>

> -----

>

> REFERENCE: Alyda White's letter, League of Women Voters,  
> Palos Verdes Peninsula News; Feb. 10, 2001

>

> -----

>

>

> The Concept of "Preservation of Public Lands for Public Use" is

> especially important to minority

> groups residing in Palos Verdes, such as: Muslims, Buddhists, Hindu, Sikh,

> Taoist, Shinto,

> Zoroastrians, et al.

>

> If a Community Center is built at the RPV City Hall Site, it will provide

> a great convenience to these

> residents who have to otherwise commute great distances to organize and

> attend their social and

> cultural activities.

>

> Most of the existing facilities in Palos Verdes area have waiting

> lists that extend months in

> advance, esp. for prime time usage. A Multi-purpose Community

> Center at RPV City Hall

> Site will certainly alleviate the crowded schedules. In addition, it

> can function as a "Public Square"

> where Peninsula residents of varying economic backgrounds,

> religious beliefs, different ethnic,

> racial, and social status can interact and dialog. Its design can

89A

- > also accommodate a park with native
- > plants, and walking trails.
- >
- > Let us preserve the Upper Point Vicente (UPV) Site. Its open space should
- > be used only to serve the
- > general public.
- >
- > Very Sincerely,
- >
- > Akhtar H. Emon
- > -----
- > 6631, El Rodeo Rd.
- > Rancho Palos Verdes,
- > CA 90275
- > (310) 332-9445

89A

**RECEIVED**

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

1:20pm

Barbara and Jack Epstein  
21 Moccasin Lane  
Rolling Hills Estates, Ca.  
90274 (310) 378-7317City of Rancho Palos Verdes  
Planning Commission

March 12, 2001

Dear Planning Commission Members,

The future of our public coastline in Southern California, and in the South Bay, especially, is very important to all of us. As neighbors who share the peninsula with you, we have been very concerned that our public land, gifted to all of us by the federal government, and supposedly protected by the Coastal Act, has come under consideration for private use.

The developers who would dare to propose such a plan for their own gain, deny public access due to the high cost of a game of golf. They ignore the will of the vast majority of local residents who prefer to leave the area natural and accessible for free hiking, and for future generations to enjoy.

The plan put forward by S.O.C.II for a nature trail and public access is the only acceptable use to consider. The policy of donating public land for private use is unethical and immoral and should be considered illegal.

The people of the peninsula will be watching the city's decisions very closely and their expectations will be for all of you on the planning commission and the council to preserve the dream that we all shared in the seventies with Save Our Coastline, when they led the way for your new city to determine its own destiny. The vision then, as it still is, was self determination and land preservation.

We are proposing to our county and state legislators that they pass laws prohibiting takeovers of public land by private developers, in order to ensure that this sort of public land grab will never again be an issue in our community.

Thank You For Your Consideration Of Our Concerns,

Jack and Barbara Epstein and Family

90A

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

MAR -9 2001

Dear Mayor, Members of City Council & Planning  
Commissioners,

Re - Long Point Resort -

At Long last, We'll have a Top notch  
facility here in R.P.V. where the community  
can hold events & High School Proms &  
main Events. A place where I can  
take my family for lunch and overlooking  
the ocean & see Catalina Island.

That's what the Long Point Resort offers -

I could hardly wait for the building  
to start.

91A

We have NO hotel at all in R.P.V.

Now we will have public trails & Picnic  
areas and Parkland will be  
created on this old tired Marineland  
property - We as R.P.V. people  
deserve this for us and our  
children - As long as the prices  
are ~~be~~ bearable for us to use -

Thank You -

Will & Mary Ann Felando  
30311 Kingsedge Drive  
Rancho Palos Verdes 90275

*Hal Fenton*  
*32267 Phantom Dr.*  
*Rancho Palos Verdes, CA 90275*  
*310-377-5814, Fax: 310-377-5655*  
*bagmantoo@juno.com*

MAR 27 2001

March 25, 2001

Mayor Lyon and members of the City Council  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275 RE: Long Point Resort

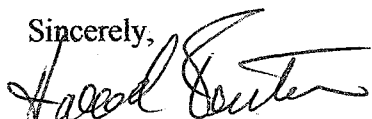
Dear Mayor and others concerned:

I would like to place my name on the list of those who believe the Long Point project will be a GOOD THING for the city.

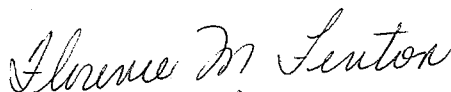
It will replace barren land with useful trails and pleasant viewing areas and will be much used by our children and others who appreciate the beauty of this area.

I live near the Ocean Trail project and find it an attractive addition to our neighborhood with no disadvantages at all.

Sincerely,



Harold & Florence Fenton



92A

**BILLANDMARTY541@cs.com, 05:12 PM 3/11/01 -0500, old nike site**

---

From: BILLANDMARTY541@cs.com  
Date: Sun, 11 Mar 2001 17:12:09 EST  
Subject: old nike site  
To: finance@rpv.com  
CC: planning@rpv.com  
X-Mailer: CompuServe 2000 32-bit sub 107

Please preserve this site as a passive park. The value of these open spaces is incalculable. Do not allow this site to be used for anything other than the pleasure of all lucky enough to view it and certainly not for a few golfers who have many established courses for their play.

Many thanks

Bill and Marty Foster, RPV

**93A**

**This letter was a duplicate  
and this comment number was intentionally omitted**



**Les Evans, 01:28 PM 3/28/01 -0800, Fwd:**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 13:28:41 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd:

From: "Susan French" <suefr@home.com>  
To: <CityCouncil@RPV.com>  
Subject:  
Date: Wed, 28 Mar 2001 12:46:54 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2919.6600

To RPV City Council: My husband and I moved to Palos Verdes 14 years ago and have been raising our family here. We have three children, ages 14, 10 and 7. They have participated in numerous athletic programs offered locally including AYSO soccer, RHLL. PV girls softball. When we were made aware of the possibility of developing athletic fields to support local programs we were thrilled. The city of RPV needs to make our youth a priority. We have visited other cities that have public recreational facilities including restrooms, parking and snack facilities. It fosters healthy activities for our children in our own backyard. We support the Long Point Development including a new recreational complex for girls softball and Ayso Soccer fields. RHLL has a nice facility. We urge the City Council to support our community and it's youth. Thank you,

Dr & Mrs. James French  
3501 Seaglen Dr.  
Rancho Palos Verdes

**95A**

To: All Planning Commissioners of Rancho Palos Verdes  
and  
Joel Rojas and David Snow of the Planning Department

From: Dena Friedson, a member of Save Our Coastline II

Re: The Draft Environmental Impact Report on the Long  
Point Hotel Project with respect to Upper Point  
Vicente - Public Hearing on March 13, 2001

As a member of Save Our Coastline II and the general public, I would like to make a few comments about the proposed Long Point golf project as it relates to Upper Point Vicente.

First, the Draft EIR states that 139,080 cubic yards of cut and 131,940 cubic yards of fill would be needed to change the contours of the land. To visualize this quantity of earth, consider the fact that an average dump truck holds 8 cubic yards. To carry this amount of dirt from one location to another, 17,385 trucks would be required. The huge alterations of ground would be held in place by tall retaining walls.

96A

Of course, dump trucks would not be the vehicles that are used. High-noise and heavy, dust-generating equipment (such as tractors, scrapers, wheeled dozers, motor graders, and water trucks) would be maneuvered around existing rare native habitats that host threatened gnatcatchers, cactus wrens, and other varieties of wildlife. Mitigation would include flagging and marking off areas where grading should be avoided and saving seeds from shrubs to be planted later.

96B

It is acknowledged that, despite mitigation measures, removal and modification of native vegetation would occur. Such damage would result in the extermination of small mammals and other animals of slow mobility. Faster wildlife would be forced to move into other remaining areas of open space where competition for available resources would result in the further demise of threatened creatures.

96C

Yet, the Draft EIR indicates that the fragmentation of this important corridor and the destruction of threatened plant and animal species would have a less than significant impact because other such plant and animal populations would remain in the region. Do you really believe that there would not be a significant impact? It seems that the CEQA guidelines have been stretched.

If the golf holes and/or driving range were to be allowed, those plants and animals that managed to survive or return would be constantly harassed and possibly physically harmed by flying golf balls and human golfing activities from dawn to darkness around their isolated habitats.

Submitted at P.C. Hearing:

3.13.01

With respect to geology, Exhibit 5.5-2 reveals another cause for concern. The map shows a large possible landslide on Upper Point Vicente where a fairway and golf hole number 5 are proposed. Exhibit 5.3-4 indicates that this same general area would be graded for new habitat. The city should be extremely wary of allowing golf fairways and holes in a geologically questionable location. Experience has shown that even the most careful mitigation measures have not been enough to prevent costly disasters.

96D

A third objection to the presentation in the Draft EIR regards the discussion of views and vistas with respect to Upper Point Vicente. It is claimed that a developed condition of golf holes and a driving range would be visually compatible with surrounding land uses. It is also stated that no netting for the golf holes or practice facility is proposed. Netting may not be proposed, but it would probably prove to be necessary for safety reasons if golfing is permitted. What this section does not point out are the various locations for superb views and vistas from Upper Point Vicente that would be lost forever to the general public. Exhibit 5.13-1 shows that golf cart paths would occupy the upper rims of the slopes where the most spectacular views and vistas can be enjoyed. Anyone now can walk there on existing trails at any time. If parts of the proposed golf course were to be approved, this area would be available only to golfers during daylight hours.

96E

On Page 5.4-21, the Ishibashi farmhouse complex is discussed. It is in the area proposed for hole number 5 on Upper Point Vicente. This farmhouse complex was built in the 1920's and belonged to a family associated with agriculture on the Peninsula from that time until the mid 1990's. Its nine acres still produce crops. Agriculture has long been a part of the Peninsula scene. Rows of flowers and vegetables have lent diversity to a rural landscape. This farming complex should be preserved for local cultural reasons. It exists on city-owned land, and it should be given special consideration for historical protection.

96F

Finally, Table 7-1 compares various alternatives to the proposed golf project. The Save Our Coastline II plan surpasses all others with its protection of threatened species - both plant and animal - and its respect for environmental values. The only question raised in the Draft EIR about this alternative is that it does not enhance the resort hotel area or fulfill the project objectives of the developers. That concern should not be a responsibility of the city or its residents!

96G

Dena Friedson, 1737 Via Boronada, Palos Verdes Estates

MAR 27 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

To: All Planning Commissioners of Rancho Palos Verdes  
and  
Joel Rojas and David Snow of the Planning Department

From: Dena Friedson, a member of Save Our Coastline II

Re: The Draft Environmental Impact Report on the Long  
Point Hotel Project with respect to Upper Point  
Vicente - Public Hearing On March 13, 2001

At the above public hearing, a spokesman for Save Our Coastline II was asked where active recreation could be enjoyed on Upper Point Vicente without an amendment to the General Plan.

A delineated portion of Upper Point Vicente consists of approximately 8 acres that are shown on the General Plan as "Public." This designation allows institutional and active recreational uses. The acreage includes the administration buildings and extends to the far side of the maintenance yard.

SOC II's proposal suggests that this section of land would be ideal for grassy playing fields and picnic areas. The maintenance yard could be accommodated in an appropriate corner and concealed by attractive trees and shrubs.

The Recreation and Parks Committee, with input from residents, could select locations for various planned and spontaneous games and sports and perhaps even tennis courts. These improvements would be for the benefit of the entire community.

Dena Friedson  
1737 Via Boronada  
Palos Verdes Estates, California 90274

97A

MAR 27 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

To: All Planning Commissioners of Rancho Palos Verdes  
and  
Joel Rojas and David Snow of the Planning Department

From: Dena Friedson, a member of Save Our Coastline II

Re: The Draft Environmental Impact Report on the Long  
Point Hotel Project with respect to Upper Point  
Vicente - Public Hearing on March 13, 2001

This is a correction to my statement that was presented at the above public hearing. A copy of the statement is attached. The names are changed, but the principle remains the same.

On Pages 5.4-12 to 5.4-14 and 5.4-21, two farms are described. Both have existed since the 1920's, and both would be removed to make room for golf holes.

The Ishibashi farmhouse complex is on Long Point. The amount of land involved is not stated in the Draft EIR.

It is the James Hatano farm that is on approximately eight-and-a-half to nine acres of land leased from the city. Crops are still being grown on Upper and Lower Point Vicente sites.

Agriculture is part of the Peninsula's heritage. It helps to provide a semi-rural atmosphere. Farming on publicly owned land should be given historical protection and should be preserved as a local cultural asset.

98A

Dena Friedson  
1737 Via Boronada  
Palos Verdes Estates, California 90274

To: All Traffic Committee Members of Rancho Palos Verdes and  
Joel Rojas and David Snow of the Planning Department  
and Dean Allison of the Public Works Department

From: Dena Friedson, a member of Save Our Coastline II

Re: The Draft Environmental Impact Report on the proposed  
Long Point Project with respect to traffic - Hearing  
on March 26, 2001

The Draft EIR seems to ignore or barely mention several major activities that would have very significant impacts on traffic for at least 2 years.

Exhibit 3-7 shows a Palos Verdes Drive undercrossing between the hotel resort area and Upper Point Vicente. There is no discussion of how much earth would be excavated, what kind of heavy equipment would be used, how long the work would take to dig the tunnels and rebuild the roadways, or how traffic would be handled as cars tried to get through the area. There are no alternate routes between Palos Verdes Drive East and Hawthorne Boulevard. Traffic to and from schools alone would be seriously affected in addition to all other local driving requirements.

99A

On the Upper Point Vicente side, the passageway would emerge in a location shown on Section 5.5-2 as a questionable landslide area. Imagine the impact on traffic circulation, public safety, and costs and liability to the city if a landslide were to be triggered by excessive trenching.

99B

The Draft EIR does not analyze the effects of construction on traffic circulation. In Table 5.2-3 (Air Quality Construction Emissions), there is a list of heavy, noisy, dust-producing vehicles that would be used. Exhibit 3-10 indicates that grading and infrastructure improvements and developing the golf course would start during the first quarter of 2002 and continue through the first quarter of 2004. Demolition of existing structures would start sooner. Heavy vehicles would move through city streets and up and back between the hotel resort area and Upper Point Vicente for at least a 24-month buildout period. They would certainly cause undesirable traffic problems. They would not be allowed to go through Palos Verdes Estates. (See the letter in the Appendix.) Palos Verdes Drive West between Bluff Cove and Malaga Cove can not be widened because of existing homes and hillsides of questionable stability. Trucks and heavy equipment moving between the project and San Pedro would cause significant impacts on Palos Verdes Drive South in the landslide area. A number of years ago, Rolling Hills Estates changed Palos Verdes Drive North from 4 lanes to 2 lanes to reduce noise, pollution, and traffic.

99C

Hawthorne Boulevard is the only way for heavy vehicles to travel.

99C

Hawthorne Boulevard, which currently has problems at several locations at various times, would suffer increased congestion. The Draft EIR suggests that the worst traffic conditions could be mitigated by restriping intersections for right and left hand turns. It does not discuss ways to redirect the flow as lanes reach maximum capacity. There are very few alternate routes on or leading off the Peninsula for personal cars to follow.

99D

Section 5.2 discusses the effects of the proposed project on air quality. Fine particulate matter and diesel emissions would have significant and unavoidable impacts both before and after the mitigation required by the city's codes and the rules of the Southern California Air Quality Management District. The only way to lessen these impacts would be to reduce the amount of heavy grading and construction and the amount of related vehicular traffic.

99E

Eliminating Upper Point Vicente from the hotel resort proposal would help to achieve the goals of better traffic circulation and better air quality.

Dena Friedson  
1737 Via Boronada  
Palos Verdes Estates

To: All Planning Commissioners of Rancho Palos Verdes  
and  
Joel Rojas and David Snow of the Planning Department

From: Ann Shaw and Dena Friedson, members of Save Our Coastline II

Re: The Draft Environmental Impact Report on the Long Point Hotel Project with respect to Upper Point Vicente - Air Quality

RECEIVED

APR 04 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

The discussion of air quality throughout Section 5.2 acknowledges that impacts from nitrogen oxides and fine particulate matter would be significant and, even with legally required mitigation measures, could not be reduced to acceptable levels in the short term and would remain in the long term. The so-called short term is at least a period of 2 years, during which time demolition, grading, and construction would occur.

For at least 24 months, a variety of heavy-duty diesel and dust-generating vehicles and equipment would be used on Long Point and Upper Point Vicente to scrape, excavate, bulldoze, fill, and grade huge amounts of earth and to transport machinery, supplies, and rubble to and from the sites.

The Draft EIR concludes that the impacts would be significant but unavoidable and that no additional measures would need to be taken beyond adherence to the City's development code and the South Coast Air Quality Management District rules. If the City were to approve the project, the City would have to cite its findings and prepare a Statement of Overriding Considerations in accordance with Section 15093 of CEQA.

We question the word "unavoidable." We believe a good deal of this air pollution could be greatly reduced by limiting the developer's activities to his own property. The work would be contained on only 1 side of Palos Verdes Drive. Much less scraping, grading, digging, and bulldozing would be required. Fewer truck trips would be needed. Tunnels would not be excavated under Palos Verdes Drive. The project would be completed in a much shorter time.

A study could be done on the difference in impacts with and without the use of Upper Point Vicente land, but the answer seems obvious. Avoiding drastic disturbance of a large amount of acreage means much less pollution and much better air quality.

100A



Les Evans, 11:59 AM 3/9/01 -0800, Fwd: Long Point Development-a resident opinion

---

X-Sender: LesE@207.238.114.197  
 X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
 Date: Fri, 09 Mar 2001 11:59:50 -0800  
 To: davids@rpv.com  
 From: Les Evans <lese@rpv.com>  
 Subject: Fwd: Long Point Development-a resident opinion

From: "q" <docfung@earthlink.net>  
 To: <CityCouncil@rpv.com>  
 Subject: Long Point Development-a resident opinion  
 Date: Fri, 9 Mar 2001 12:07:05 -0800  
 X-Mailer: Microsoft Outlook Express 4.72.3155.0  
 X-MIME-Autoconverted: from 8bit to quoted-printable by faxmail.rpv.com id LAA06874

CARLTON H. FUNG, D.D.S.  
 30320 Calle De Suenos  
 Rancho Palos Verdes, Ca. 90275  
 310-541-4744  
 FAX 603-710-6393  
 E-mail DocFung@earthlink.net

Mayor Lyon, Members of the City Council and Planning Commission  
 City of Rancho Palos Verdes  
 30940 Hawthorne Blvd.  
 Rancho Palos Verdes, CA 90275 3/8/01

Dear Mayor, Members of the City Council and Planning Commissioners:

I have been a resident of RPV for 32 years. My families are opposed to development at Long Point. I grew up on the quiet residential street that became the "Los Verdes Golf Course Raceway". The traffic from golf courses is not in the best interest of RPV. I was even hit by a car on my street as a small child while a speeding golfer lit his cigarette on the way to Los Verdes CC. Twenty-five years later the traffic is no better and the cars drive just as fast. All the revenue RPV could ever need could be made by one traffic patrolman and his radar gun at 30057 Avenida Classica.

We have a new golf course on the South end of Palos Verdes with 15 holes since the 18th has fallen into the ocean despite thoughtful placement and assurances of positive environmental impact. Despite the developer's intent and attempts the record speaks for itself.

The last thing RPV needs is more traffic and more people who do not live in the area adding to noise and traffic congestion. The facts are that no development is without "environmental impact". Please protect RPV for future generations. If we residents of RPV wanted "no open space" we would live in Redondo Beach. Lets keep what we have already built in good

101A

repair. How about making our roads safer by getting the self forming speedbumps off of Crenshaw blvd. or regravell the truck gravel trap on Hawthorne blvd. . If RPV needs revenue lets slow traffic to 25mph as posted in our residential streets and ticket cars that don't turn their wheels into the curb for safety like the California Driver's Handbook says.

**101A**

Regards,

C. H. Fung, D.D.S.

Fung Family  
30320 Calle De Suenos

Fung Family  
30057 Avenida Classica

Long, Thomas D., 01:02 PM 3/9/01 -0800, RE: Protection for Wildlife and People on City Land

---

From: "Long, Thomas D." <tlong@nossaman.com>  
To: "Soc2steering@aol.com" <Soc2steering@aol.com>  
Cc: "joelr@rpv.com" <joelr@rpv.com>, "davids@rpv.com" <davids@rpv.com>  
Subject: RE: Protection for Wildlife and People on City Land  
Date: Fri, 9 Mar 2001 13:02:32 -0800  
X-Mailer: Internet Mail Service (5.5.2653.19)

Barbara,

Thank you for this information. Joel we should compile all of this in hard copy form and make sure it is available to interested parties and the applicant before and at our hearings.

Tom Long

-----Original Message-----

**From:** Soc2steering@aol.com [mailto:Soc2steering@aol.com]  
**Sent:** Friday, March 09, 2001 12:28 PM  
**To:** Fnplyon@cs.com; Long, Thomas D.; mueller@earthlink.net  
**Cc:** DennisM@rpv.com  
**Subject:** Protection for Wildlife and People on City Land

Dear Members of the Planning Commission and Financial Advisory Committee:

Because of the significance of the United States Fish and Wildlife Service, the California Department of Fish and Game and the National Park Service at the Department of Interior as determining factors in the ultimate usage of the city hall land, I am forwarding two recent letters from them. To summarize, they point out (1) that the Upper Point Vicente Park is an area that requires protection for the threatened gnatcatcher and (2) the necessity for the public to have access to the open space deeded to us by the Department of Interior. We believe their statements are important for your consideration. (The underlining is ours.)

102A

We look forward to the meetings next week.

Dennis McLean: Please forward to the Financial Advisory Committee.

Sincerely,

Barbara Gleghorn  
SOC II Steering Committee

The attached file is in rich text format and can be opened in MSWord.



U.S. Fish and Wildlife Service  
Carlsbad Fish and Wildlife Office  
2730 Loker Avenue, West  
Carlsbad, California 92008  
(760) 431-9440  
FAX (760) 431-5902 + 9618



CA Dept. of Fish & Game  
4949 Viewridge Avenue  
San Diego, California 92123-1662  
(619) 467-4201  
FAX (619) 467-4235

In Reply Refer To:  
FWS-LA-755.2

MAR - 1 2001

Joel Rojas  
Director of Planning, Building and Code Enforcement  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, California 90275-5391

Subject: Alternative 5 of the Rancho Palos Verdes NCCP, Los Angeles County, California

Dear Mr. Rojas:

This letter provides our comments regarding proposed Alternative 5 of the Rancho Palos Verdes Peninsula Natural Communities Conservation Planning (NCCP) Program dated November 22, 2000, and the upcoming Rancho Palos Verdes City (City) Council hearing to adopt a preferred project alternative for analysis and public review. Over the past year the Department of Fish and Game (Department) and U.S. Fish and Wildlife Service (Service), the "Wildlife Agencies," staff from the City of Rancho Palos Verdes (City), and local landowners representatives have met to discuss the development of an alternative that would meet the goals of the NCCP effort and the landowners. As discussed with you over the past few months we continue to have concerns about the proposed "Alternative 5" reserve design. We are particularly concerned with the proposed development within the large blocks of habitat primarily on City Hall property and in the moratorium area near Peacock Flats under this alternative. These concerns are based on our evaluation of the consistency of the alternative with the NCCP Conservation Guidelines and the conservation plan's ability to meet the preserve design tenets/species requirements.

As previously discussed with you, we are concerned with the existing proposals for the York/Long Point and Hon Company projects. The York/Long Point (Destination Resorts) development continues to propose development on the former Marineland site, City Hall, and National Park Service properties, and would impact a highly productive area for the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*, "gnatcatcher"). Hon Company (Palos Verdes Land Holding Company) has proposed a project within the Portuguese Bend landslide moratorium area that would impact the large core habitat area and bisect the remaining habitat.

We understand that a previously approved project has obtained land use approvals from the City that are necessary to develop the former Marineland site. The Wildlife Agencies maintain that development of the proposed project on the Marineland site would be consistent with NCCP.

18

Joel Rojas

2

However, the project by York/Long Point proposes to develop a resort hotel, 9-hole golf course, and associated amenities on the former Marineland site, existing public lands owned by the City, and public lands acquired by the National Park Service with Federal Land and Water Conservation funds. We maintain that their proposal will significantly reduce productive gnatcatcher habitat, particularly on the City Hall land. Though the City had indicated that sage scrub would remain or be revegetated on the property, these areas would become further fragmented by the proposed development. The sage scrub habitat would not be contiguous, would be patchwork of lands surrounding the proposed fairways within the golf course, and unlikely be able to maintain a productive gnatcatcher area. Public lands that support sensitive habitat and species should be considered a priority for being placed into the reserve to maximize conservation benefits and minimize acquisition costs of the NCCP plan. Additionally, the partial loss or fragmentation of City Hall lands would compromise the linkage of the 30-acre mitigation site on Subregion 1 and the Agua Amarga Canyon, another productive gnatcatcher habitat area on the peninsula.

The Lower Filiorum project is also being proposed by York Long Point Associates. This area is a key linkage/connector between the coastal bluffs and Upper Filiorum. A functional connection must be retained through this area. The reserve design now only indicates that a habitat linkage is planned, but linkage criteria are not specified nor are hardlines shown. Alternative 5 also proposes to eliminate more of upper Filiorum that encroaches further into the core habitat areas.

The Hon Company is proposing to develop the golf course and associated amenities within the Portuguese Bend and Peacock Flats areas. The proposed golf course project had not provided required geological studies to verify that it can meet the acceptable safety factor for these activities. Although the project proposes habitat linkages within the golf course, placing large "bubbles of nonhabitat" in the core area of undeveloped land within the landslide is problematic. Although not all of the habitat within the proposed golf course is pristine, it comprises the largest block of sage scrub in the planning area. The current configuration of the golf course significantly impacts the core habitat area and further fragments this area. In addition, the fragments of restored habitat within the golf course likely will not support successful breeding by gnatcatchers. Moreover, these fragments likely will function as habitat for brown-headed cowbirds, which are nest-predators of the gnatcatcher and other sensitive birds. The proposal also significantly increases the amount of urban edge around the reserve lands, that reduces habitat values and increases management needs. Consolidating the golf course footprint, identifying appropriate edge landscaping and specifying management actions, such as cowbird control, also should be included.

The Ocean Trails Golf Course, is located in an ancient landslide area that was certified safe for construction. A 1999 landslide within the golf course raises concerns that a golf course in Portuguese Bend, even if it is able to meet the current landslide safety/risk requirements, may not be stable in the long-term and require additional work that could further reduce habitat acreage.

Land on the west side of Palos Verdes Drive South in the Portuguese Bend area that is currently not proposed for conservation should be reconsidered. The City has chosen not to include these lands in the proposed reserve because of the City's desires to conduct landslide remediation

(19)

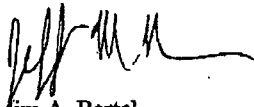
Joel Rojas

3

activities associated with the stabilization of the moratorium area and Palos Verdes Drive South. The NCCP can include the area as a reserve and address proposed landslide stabilization as a covered activity in the permit. Following the stabilization activities, the area could be revegetated with native drought tolerant vegetation to augment the coastal bluff reserve.

We appreciate the City coordinating with the Wildlife Agencies, and hope that these comments are helpful in assisting the City with the development of an alternative that balance the goals of the NCCP program with the needs of the City. We continue to be available to work with the City, your consultants, and the various stakeholders to prepare a plan that is consistent with NCCP Conservation Guidelines. We are also available to provide guidance and input on how to reduce impacts to the species we are addressing under this plan and to ensure that proposed alternatives avoid and minimize take of listed species to the maximum extent practicable. Please contact William Tippets at (619) 467-4212, of the Department or Mary Beth Woulfe at (760) 431-9440, of the Service, if you have any questions or comments concerning this letter.

Sincerely,

  
Jim A. Bartel  
Assistant Field Supervisor

William E. Tippets  
Environmental Program Manager

cc: City of Rancho Palos Verdes Council Members  
City Manager, Rancho Palos Verdes (Attn: Les Evans)

(20)



# United States Department of the Interior

NATIONAL PARK SERVICE  
Pacific West Region  
Pacific Great Basin Support Office  
600 Harrison Street, Suite 600  
San Francisco, California 94107-1372

IN REPLY REFER TO:

L2623(PGSO-PP)

AUG 28 2000

Joel Rojas, Director  
Planning, Building and Code Enforcement  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

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SEP 01 2000

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: Input for Scoping to Long Point Resort Project Environmental Impact Report

Dear Mr. Rojas:

In response to your notice of a Draft Environmental Impact Report for the Long Point Project, the National Park Service offers the following input to help facilitate the use of your Environmental Impact Report (EIR) in our National Environmental Policy Act (NEPA) compliance for the above project.

1. As we expressed to you in our letter of June 26, 2000, the National Park Service is legally prohibited from approving any change of use to the parcel of land which we transferred to the City of Rancho Palos Verdes that would jeopardize the California coastal gnatcatcher, federally listed as an endangered species. We encourage the proponents of the Long Point Development to develop and analyze a full range of alternatives for their project, including those, which will not jeopardize existing gnatcatcher habitat.
2. Because of concerns regarding the proposed change of use of the land we transferred, the National Park Service requests that the EIR address the impacts that this proposal will have on public access to open space and coastal access in your community.

We appreciate the opportunity to participate in your environmental impact report.

Sincerely,

Jeff McCusker  
Outdoor Recreation Planner

**Statement by Save Our Coastline II to Rancho Palos Verdes Planning Commission  
March 13, 2001**

For over 4 years, a private developer has been negotiating with the City of Rancho Palos Verdes for a concession that would use most of our public Point Vicente Park for a portion of his golf course. Thousands of RPV residents have documented their objection to the continuation of this negotiation - but the consideration continues. Now, instead of only objecting to the loss we would face, members of Save Our Coastline II have proposed an alternative concept for the improved care of this valuable open space. Our proposal was presented to the City Council on January 16 and we appreciate your invitation to present it to you this evening.

Basically, we are recommending that the RPV Recreation and Parks Department and Planning Department be directed to develop, with maximum public input, a plan for the improvement of Point Vicente Park.

Our concept is not original. Essentially, we are asking the City to honor the spirit and retain the integrity of the agreement that was made some 25 years ago between the new City of Rancho Palos Verdes and the federal government. At that time, the original City Council, when applying to the National Park Service for ownership and control of the former Nike missile site, said "... 68 acres of passive open space surrounds and complements the proposed administrative center and provides needed open space for this part of the City". Open space was needed then and it is needed even more now, as much open space has been developed in the interim. The special ambience of the Peninsula, which keeps our property values so high, is unique in Los Angeles County and is heavily dependent upon maintaining our open space.

The founders, most of whom were members of the original Save Our Coastline, were not asking for control in order to turn the land into a commercial development. They clearly stated that a small area, up by Hawthorne Boulevard and the entrance to the Civic Center, would be utilized for active recreation - but that the preponderance of the property, 65 acres, would be devoted to passive recreation and open space. They said, "Because of slope stability and topography considerations, development would include initially only vista and picnic areas and trails. Additional landscaping would be planted to enhance the native growth."

We are proposing that the original commitment be honored. The level section near the City Hall could serve recreational uses, both active and passive. Playing fields and picnic areas could fade into a large grassy section that would stretch to the bluff edge - overlooking Point Vicente Lighthouse to the south and the Santa Monica coastline to the north. By the edge of the bluffs, benches could be placed to take advantage of the scenic vistas. A series of trails connecting the upper and lower areas could guide people along the perimeter of the bluffs and down to designated areas to enjoy the existing and restored habitat. Some trails could be designed for handicapped or senior access. Eventually, educational opportunities might evolve that would complement those offered by the Interpretive Center.

SOC II is suggesting that this is a propitious time to begin providing the improvements proposed so long ago. RPV has set a splendid example by its participation in the Natural Communities Conservation Plan (NCCP), acknowledging the need to protect the precious habitats of federally threatened species and to restore areas that have been damaged.

103A



General awareness of the need to protect or restore native vegetation and sensitive habitats has greatly increased in recent years, as have the numbers of community groups willing to take an active part in these efforts. The stewardship of the Palos Verdes Peninsula Land Conservancy over White's Point and other areas can offer an example to adult groups - such as Audubon, Los Serenos and the California Native Plant Society - and to young people in school groups as well as Scouts and 4H. Such groups might work on habitat restoration to protect the threatened gnatcatcher and cactus wren. Other groups might build or maintain trails to the natural areas. Some community groups with particular interests could be encouraged to come forward to develop and maintain the active recreational areas or bluff-side viewing areas. The land is already ours. It should be kept under the active control of our elected officials. It only needs the attention and protection it deserves.

The United States Department of Interior, the United States Fish and Wildlife Service and the California Department of Fish and Game have all focused on Point Vicente Park as the main area for their expressed, serious concerns about habitat preservation. Their most recent letters (which we provided you prior to this meeting) show their particular concern for the "highly productive area" of Point Vicente Park for the federally threatened Coastal California Gnatcatcher. Additionally, they emphasize that, if conservation is to be fiscally wise, the highest priority should be given to retaining land already in the public domain.

As you are aware, there are a number of opportunities to improve current features of the Park. (1) The maintenance yard - which is an eyesore for a number of residents - could be confined to a small, secluded area and concealed by trees and shrubs. (2) Well placed landscaping, with special arrangement of trees could greatly improve the appearance of City Hall, as seen from other locations. And trees could be planted to screen parking areas. (3) A distinct area for small, outdoor meetings could be created - in addition to the solitary benches for enjoying the magnificent views.

Over its quarter century plus of existence, RPV has done an excellent job in the creation of Fred Hesse Park with its fine community gathering facilities; Robert Ryan Park with its imaginative playground; Abalone Cove Beach with its superb tidepools; and the Interpretive Center with its appropriate museum and whale-watching station. We have a unique opportunity to complete the balance by now providing a well-planned refuge of serenity for our people in this large remaining natural setting. The 1975 proposal states, "Views . . . are exceptional, offering 270 degree 'view sheds' of the coastline and ocean". It would be a fine legacy for this Planning Commission and City Council to work together to secure the future of this treasure for all our residents. We appreciate your consideration of SOC II's concept as an alternative proposal for Point Vicente Park.

I would like to share our time with Jim Knight - who you may know as an active participant in the Natural Communities Conservation Plan. He is a knowledgeable and strong supporter of keeping, restoring and protecting our native habitats. He is here this evening to offer an imaginative and well-informed plan - as one possible scenario that could emerge from the SOC II concept.

To: The Planning Commissioners of Rancho Palos Verdes  
and  
Joel Rojas and David Snow of the Planning Department

From: Save Our Coastline II

Re: The Draft Environmental Impact Report on the Long  
Point Hotel Project with respect to Upper Point  
Vicente - Trails and Parks

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APR 04 2001  
PLANNING, BUILDING,  
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In their advertising, the Long Point Resort developers claim that they will provide 11 miles of new trails. The Draft EIR shows the locations of pedestrian trails on various exhibits. Most of these public trails seem to be in the same places as existing paths and streets. Their advertising also states that 5 new parks will be developed.

By reading Page 5.13-21 of the Draft EIR, we learn that 3.8 miles of "new" public trails would be in the Long Point area and would include renovated historic coastal ramps. There would be 1.3 miles of resort walkways around the hotel facilities and buildings. Adjacent to the hotel area, but off-site, would be 0.2 miles; and 0.5 miles would connect the resort grounds to the Point Vicente Interpretive Center. Some of this trail system would include space for bicycles.

Golf cart paths of 3.2 miles in the resort hotel area and on Upper Point Vicente would be available to the general public during non-golfing hours (before dawn and after dusk).

In the Upper Point Vicente area, there would be 1.2 "new" off-site public trails around the Civic Center and 0.9 miles of "new" general public trails/stairway. In Upper Point Vicente Park, it is already possible for everyone to walk everywhere in the Civic Center area, along Hawthorne Boulevard, and down existing pathways to Palos Verdes Drive. The general public has long used many existing paths with scenic views throughout the 65 acres surrounding City Hall.

Exhibit 3-3 of the Draft EIR shows 7 parks including parking. Page 5.13-20 states that the development proposes 5 acres of general public parkland. On Upper Point Vicente, 3 of the proposed parks would total 2.8 acres for both recreation and parking. However, 2 acres of the existing Civic Center grass area would be removed for the golf course. The DEIR does not mention that the 2.8 acres would be subtracted from the 64.9 acres of already publicly owned land that would be used for 6 golf holes. The general public would lose 62.1 acres of parkland in Upper Point Vicente.

104A

We have many questions about the proposed trails and parks. How many miles of so-called "new" trails would actually be new in the resort hotel area and in Upper Point Vicente? How many miles would be for pedestrians only in each area? How many miles of pedestrian trails are required by the City as a condition of project approval in the resort hotel area and in Upper Point Vicente? In the resort hotel area and in the Upper Point Vicente area, how many miles in reality are traced over old paths or walkways or along streets? How many miles of old existing trails would be taken away by golfing activities in Upper Point Vicente? What does "new" mean? Does it mean an application of decomposed granite or defined edges on trails long used by the public or an addition of signs on trails and roads? How many miles of walking trails and acres of parks are shown on the Monaghan Plan? The Draft EIR does not give these figures or provide a map when discussing Alternative 7.2.

104B

Please provide answers and comments to the above questions and expressions of concern as soon as possible as well as in the Final EIR. It is important for everyone to have a clear and accurate understanding of what might be gained compared to what would be lost.

C/O Barbara Gleghorn  
28850 Crestridge Road  
Rancho Palos Verdes

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COMMENT NO. 105

APR 06 2001

April 5, 2001

To: The Planning Commission of Rancho Palos Verdes  
and  
Joel Rojas and David Snow of the Planning Department  
& CODE ENFORCEMENT

From: Save Our Coastline II

Re: The Draft Environmental Impact Report on the Long  
Point Hotel Project with respect to Upper Point  
Vicente - Native Habitats

If the proposed Long Point Hotel project is allowed to use Upper Point Vicente for 6 golf holes, 25% of the existing critical habitat in our public parkland will be obliterated.

105A

Pages 3-13 and 3-14 describe the number of existing acres of coastal bluff scrub and coastal sage scrub on Long Point and Upper Point Vicente and the number of acres of this native vegetation that would be removed to accommodate the hotel facilities and the golf course. The numbers are presented in a very confusing way. (See attached page.) However, the summary on Page 5.3-42 states that 5 acres of habitat would be removed and that 16.8 acres would be restored, creating a compensation replacement ratio of 3.4 to 1 (actually 3.36 to 1). This figure is not much different than the typical standard.

105B

Then the Draft EIR dares to suggest that the remaining 22.94 acres of already existing habitat, which bulldozing and grading did not destroy, could be added to the newly seeded 16.8 acres and thus increase the compensation ratio of the mitigation program to more than 7 to 1. This falsely inflated figure is definitely misleading.

Actually, the developers have no right to remove or harm any of these special plants, which host many different creatures. Last October, the United States Fish and Wildlife Service issued a final decision designating coastal sage scrub as critical habitat for the preservation and protection of the threatened gnatcatcher. Page 5.3-38 reminds us that the 4(d) special rule - which allows the destruction of coastal sage scrub in one area if it is replaced by more in another - can no longer be applied. The permitted amount of 5% "take" has been surpassed. Thus before any coastal sage scrub can be harmed in any way, consultations among representatives of the United States Fish and Wildlife Service, other concerned federal agencies, the City, and the developers must occur. According to the provisions of Section 7 of the Federal Endangered Species Act, the federal agencies must insure that no actions are authorized that are likely to jeopardize the continued existence of the threatened gnatcatcher.

105C

According to the information on Page 5.3-42, Upper Point Vicente currently contains 19.54 acres of coastal sage scrub. Changing the land contours for golf would remove 4.91 acres of these healthy plants. This is a 25% loss of critical vegetation, and the developers would have this occur on publicly owned land that provides a necessary corridor linkage to other sensitive habitats.

105C

Barbara Gleghorn and Dena Friedson  
C/O 1737 Via Boronada  
Palos Verdes Estates, California 90274

Attachment to April 5, 2001 Statement  
of Save Our Coastline II

The Draft EIR provides a confusing and even misleading description of the number of acres of coastal sage scrub that would be conserved, enhanced, and created on Upper Point Vicente. Page 3-13 indicates that there are 24.9 such acres. The same page states that there are 5.3 acres of coastal bluff scrub and 1.4 acres of rocky shore on the Long Point property. This makes a total of 31.6 acres.

Page 3-14 says that of these 31.6 acres, 22.6 acres of native habitat currently exist and that 9 acres would be added. These figures seem to apply to both Long Point and Upper Point Vicente.

Then, according to descriptions on the same page, it is acknowledged that 2.5 acres of habitat exist adjacent to proposed fairways and park areas. Removal of 2.3 acres of native vegetation would occur. Only 0.2 acres would remain, and 8.4 acres would be added.

Next, the Draft EIR concludes that the proposed project contains 25.1 acres of existing habitat ( $22.6 + 2.5$ ), of which 2.3 acres would be destroyed, and then 17.4 acres of new habitat would be created.

On Page 5.3-42, the Draft EIR states that Upper Point Vicente contains 19.54 acres of existing coastal sage scrub. Of this amount, 4.91 acres would be removed. Then 16.8 acres of new habitat would be created. On the hotel resort property, the 5.3 acres of coastal bluff scrub and 1.4 acres of rocky shore are now shown to be 4.44 acres of coastal bluff scrub and 3.87 acres of rocky shore/coastal bluff habitat. In the resort hotel area, 0.1 acre of coastal bluff scrub would be removed.

The summary on Page 5.3-42 indicates that 5 acres of habitat would be taken, and 16.8 acres would be restored. The figures are confusing and seem to be inconsistent on the various pages. The Final EIR should clarify the numbers. Half an acre is a fairly big piece of land.

Barbara Gleghorn and Dena Friedson

**SAVE OUR COASTLINE II**  
**P.O. BOX 3984, PALOS VERDES PENINSULA, CA 90274**  
 PHONE: (310) 377-2168 FAX: (310) 377-1228  
 Soc2Steering@aol.com

**RECEIVED**

13 March 2001

MAR 22 2001

Planning Commission  
 City of Rancho Palos Verdes  
 30940 Hawthorne Blvd  
 Rancho Palos Verdes, CA 90275

PLANNING, BUILDING,  
 & CODE ENFORCEMENT

Subject: Draft Environmental Impact Report, Section 7.2

A careful reading of DEIR Section 7.2 entitled "No Project Alternative" reveals that contained in it there are a number of contradictory statements, questionable assumptions and a lack of quantified evidence to support the conclusions given in several of the impact comparison sub-sections. Based on the available data, it seems clear to us that Alternative 7.2 is environmentally superior to the Destination Resorts Project (the Project).

Section 7.2, the No Project Alternative, is confusingly named. It is actually the alternate development known locally as the "Monaghan Plan" which is approved by the City and the California Coastal Commission for development of a resort hotel and 9-hole golf course wholly contained on the former Marineland site. This property is also referred to as the Resort Hotel Area (RHA). We would recommend that a different name be chosen for the alternative which reflects these facts, such as the Previously Approved Project Alternative.

**106A****Discussion:**

The DEIR states, on page 7-9, "This alternative would be generally similar to the proposed Project, however, would exclude the use of the [Upper Point Vicente Area] UPVA, resulting in a more intensified use of the RHA. . . . Overall, this alternative would involve more intensive development, contained in a smaller area, than the proposed project." The term "more intensive development" requires definition in both a qualitative and a quantitative sense since it is used throughout the remainder of Section 7.2 when comparing the alternative to the Project. As Table 1, below, shows, the two proposals are similar in most aspects of development of the RHA, with the proposed Project having the larger number of buildings to be erected and involving tunneling under Palos Verdes Drive. Therefore, it is not clear what, if any, objective criteria were used to come to the conclusion that the development of the Alternate is "more intensive". The DEIR needs to be more explicit so that intelligent comparisons can be made on each of the environmental impact sub-sections. It should not be sufficient to state that alternate X would be better/worse than the proposed Project. Quantitative data should be given so that the magnitude of the stated differences can be assessed.

**106B**

SOC-II DEIR Alternate 7.2

March 13,

2001

In any case, the conclusion as to “more intensive development” is applicable solely to the RHA. It should be clear that in the overall sense, i.e., including the UPVA, Alternate 7.2 involves less actual development.

**Table 1 - Features of Alternate Proposals**

Feature	Proposal Pg 2-1	Alternate 7.2 Pg 7-9
Guest Rooms (Main Hotel/Bungalows)	400	390+10
Resort Casitas (Three-keyed)	50	50
Resort Villas	32	none
Banquet/Meeting Rooms	68,000 sq ft	30,000 sq ft
Country Market/Café		30,000 sq ft
Full Service Spa	25,000 sq ft	25,000 sq ft
Swimming pools/spas/Jacuzzi	7(max)	not cited
Tennis Courts	4(max)	8
Golf Holes on RHA	5	9
Resort food & beverage services		
Parking, Trails		

106B

## Air Quality

There should be data expressed quantitatively by source to support the conclusion expressed that “Emissions... would be greater with this alternative due to more intensive development.” It is difficult to imagine why there would be other than a quite small difference in emissions related to grading and construction activities for the two alternatives, based on Table 1. Given the 32 extra villa units of the Proposal, it is surprising that Alternate 7.2 is stated to have a greater impact on the environment due to development on the RHA.

106C

On page 7-11 the DEIR states that “Overall, emissions ...for this alternative would be *less* than with the proposed Project...” due to no development on the UPVA. Thus, it seems to be wrong to have Table 7-1 of the DEIR show that Alternate 7.2 “No Project” has *greater* impact on air quality than the proposed Project.

## Geology, Soils and Seismicity

The DEIR states that Alternate 7.2 “would expose a slightly greater number of people and structures to potential adverse effects ... within the RHA due to a more extensive development”. There does not seem to be any basis for this statement, given the comparison of the two alternatives as expressed in Table 1. No quantitative data is offered and one expects that it simply does not exist.

106D

It may well be true (no data is provided in the DEIR proper) that golf holes are laid out closer to the bluffs in Alternate 7.2. If this is the basis for the judgement of greater impact in Table 7-1 it



should be backed up with specific quantitative data. However, there are clearly geological hazards associated with the Project's planned use of the UPVA, notably the grading of the present farmland noted in DEIR Exhibit 5.5-2 as a possible slide area which are not addressed. This propensity for hazard should be quantified to compare to that of the golf layout in determining which alternate has the greater impact.

106D

### **Marine Resources**

Again, greater impact on the environment, in this case "greater Long-term impacts to marine plant or animal species ..." is imputed to "more intense development on the RHA". One needs to know precisely what aspect of the stated more intense development is responsible for this alleged impact and how the two alternatives compare quantitatively on each of these aspects. Based on the comparative numbers in Table 1 above, it is difficult to see that much difference could exist. In this case Table 7-1 indicates that the impact of Alternate 7.2 is "*equivalent to*" that of the Project.

106E

### **Noise**

On page 7.13, a slightly greater impact on the environment is again laid to a more intensive development. A quantified comparison of this potential impact should be provided. Again, it is hard to believe that the difference is significant enough to generate a finding of "greater impact" for Alternate 7.2. as is indicated in Table 7-1.

106F

### **Public Services and Utilities**

It would be useful to know the rationale behind the alleged "slightly greater demand" for fire and police protection and schools for Alternate 7.2, particularly in view of the 32 villas planned for the project. Surely an additional 32 dwelling units should outweigh any differences in the numerically equal main hotel and out-buildings on the RHA. The judgement of greater impact for Alternative 7.2 in Table 7-1 is suspect.

106G

### **Traffic and Circulation**

It is impossible to believe that two alternatives so closely matched as these in their total facilities (see Table 7-1) and intended usage could generate a 50% difference in average daily trips. Surely this discrepancy calls for an examination of the two studies and a reconciliation of their ground rules and estimates. A rational presumption would be that, given the 32 villas and otherwise comparable facilities, not to mention additional trips for the golf driving range, there would be slightly more ADTs for the Project, not 3,356 less. Section 5.12, which details the methodology for the traffic study for the Project appears to use only the figures of Table 1, above, as the basis for the estimate, again lending incredibility to the conclusion. In this analysis, 188 ADTs are attributed to the 32 villas which would not be present in Alternate 7.2.

106H

To us, the fact that two professional firms should arrive at such a large difference in estimates

from such similar bases calls into question the accuracy of the estimates discussed in Section 5.12. They should not be accepted without the comparative analysis suggested above.

106H

### **Recreation**

The conclusion on page 7-15 that the Project is superior to Alternate 7.2 is based primarily on the fact that trails on UPVA would not be developed by the Project, thus depriving the public of upgraded trails. That is a judgement call. After all, development of the UPVA as a portion of a golf course would cause the public to *lose* access to many existing public trails on the property. Many citizens believe that preserving the public land from development as a golf course is so far superior to the development proposed by the Project that there is no question of what is the proper course of action.

106I

### **Summary**

The above paragraphs show that in seven of the thirteen areas of interest the conclusions of the DEIR are questionable. The other six allege equivalence of the two plans. No quantitative assessment is offered to aid the decision-making bodies to judge whether the differences alleged between the alternatives are minor or major. In several of the seven instances the DEIR is, apparently, wrong or contradicts itself. The overall impression is that the DEIR is biased toward developing the Project and seriously flawed in comparing the Project to the several Alternates.

106J

SOC-II believes that the DEIR should be revamped with comparisons that are specific and quantified where feasible. Alternative 7-2 should be essentially the same in environmental impact on the RHA as the proposed Project and have less impact overall because of the exclusion of the UPVA. Development of the latter area should be a separate issue for the city, as envisioned in Alternatives 7.8 or 7.9, possibly in conjunction with Alternate 7.2

Sincerely,

George J. Gleghorn for  
SOC-II Steering Committee

CC: Traffic Committee  
Financial Advisory Committee  
RPV City Council

**SAVE OUR COASTLINE II**  
**P.O. BOX 3984, PALOS VERDES PENINSULA, CA 90274**  
PHONE: (310) 377-2168 FAX: (310) 377-1228  
Soc2Steering@aol.com

5 April 2001

Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd  
Rancho Palos Verdes, CA 90275

Subject: Draft Environmental Impact Report - Golf Hazards and Protective Netting

Mike Mohler, speaking for Destination Resorts at the Planning Commission meeting of March 13, 2001, stated that Alternate 5 "Relocate Practice Center, Option B" is now their preferred alternative for the Long Point project. This Alternative (Exhibit 7-3) places the third hole of the golf course, a dog-leg to the right, close to the northern edge of the Upper Point Vicente Area (UPVA). This means, as others have pointed out, that there is a good chance that golf balls in play will pose a danger of impact damage to St. Paul's Lutheran Church, homes in the Villa Capri complex and cars or persons on the unnamed cul-de-sac on the northwest corner of the UPVA. There also have been some observations that balls from the fairway of the second hole could land on Palos Verdes Drive. Just this last month a golf ball from Los Verdes golf course broke a window in a Villa Capri home, certainly a greater distance than from the third tee and fairway to any of the potential "targets" described above. Golf ball impact is a real threat.

107A

Furthermore, on Page 7-27, when discussing Public Health and Safety, the DEIR states in regard to the [new] third hole, "...the shots from the tee would be more apparently directed toward the residential units to the left of this hole than the practice range shots with the proposed Project." The DEIR goes on to state "...in the event this alternative were selected. Further analysis (with a grading plan) would be required..."

In discussing the impact on Visual Character the DEIR states on page 5.1-20, "No netting or night lighting of the golf course or golf practice facility is proposed." This accurately describes the current situation, but, in view of the threat described above, the future placement of protective nets as a precaution or in response to lawsuits, insurance carriers or complaints of residents seems highly likely. A similar situation led to the placements of nets at Los Verdes golf course a few years ago.

107B

We believe the DEIR should deal explicitly and in more detail both with the potentiality of

SOC-II DEIR Golf Hazards

2001 April 5,

damage from errant golf balls and with the visual impact and view impairment of protective nets, even though the latter may not now be planned. It should discuss where hazards from errant golf balls may exist, what mitigation measures would be appropriate. The DEIR should also discuss whether there is any mitigation for the unsightliness of netting. The EIR should not be approved without appropriate sections on these subjects.

**107B**

In addition to these issues for the DEIR, the Planning Commission and/or the City Council should consider restrictions on the development or any resultant concession agreement so that the citizens of RPV do not have to pay for the erection of nets on city land when they are deemed necessary in the future.

**107C**

Sincerely,

George J. Gleghorn for  
SOC-II Steering Committee

CC: Financial Advisory Committee  
RPV City Council  
David Snow

**Eldon W. Gottschalk & Associates . Inc**

555 East Ocean Boulevard • Suite 460 • Long Beach • CA 90802  
Telephone: 562-432-7002  
Fax: 562-432-6352

*Snow***RECEIVED****FACSIMILE TRANSMITTAL**

APR 05 2001

ING, BUILDING,  
CODE ENFORCEMENTDATE: April 5, 2001TO: THE RPV CITY COUNCIL AND PLANNING COMM.FROM: DIANA GOTTSCHALKFAX#: (310) 544-5291NUMBER OF PAGES (INCLUDING TRANSMITTAL SHEET): 2**IF THERE IS ANY PROBLEM RECEIVING THIS MESSAGE,  
PLEASE CALL (562) 432-7002.**

MESSAGE: As a resident of the Palos Verdes Peninsula for the past thirty two and a half years, I have waited somewhat impatiently for a plan like what the Long Point Resort is proposing. I have seen past City Councils and environmental groups force developers into BANKRUPTCY with their ploys to retain cactus covered hillsides for the likes of the nudist bathers and the lovely weed infested parking lot of the old Marineland. Finally, it is possible for honest citizens to have a lovely access to our beautiful shoreline, have a MUCH needed restaurant for ourselves, our celebrations, graduations and prom events for our children or grandchildren, and, at long last, a lovely place for out of town guests to stay. It seems to me that with all the accommodations made by the developer to bring the property use in line with what is best for the Peninsula residents, that the approval of this project is a no-brainer!

108A

**Page 2**

**I shall be overjoyed to at long last have more easy access to some of these beautiful areas. I have no qualms whatsoever about it being on OR adjacent to City property. I am also pleased that there will be another public golf course in the area. My only concern there, is that the green fees not be prohibitively high so that young people would not be able to enjoy this course.**

**Lastly, with the continuing costs of constant repair to the landslide area drive, we could definitely use the tax money which has been sadly lacking since the demise of Marineland, which, as a nationally known destination, undoubtedly drew much more traffic to our local city streets than this project would. Certainly, this influx of cash might well be used also to repair in a proper and SMOOTH manner the recently torn up Palos Verdes Drive East storm drain project area, so that we would not need to feel we were traveling on a washboard to get to our homes.**

**In conclusion, as a long-time active resident of Palos Verdes, I wish to reiterate that I am whole-heartedly IN FAVOR of the Long Point Resort and look forward to the day when I can proudly share with my guests a destination in the class of The Del Coronado Resort.**

**Thank you for your time, and for reading this letter at your meeting.**



108A



**Zeljer@aol.com, 02:51 PM 3/10/01 -0500, Development in Rancho Palos Verdes**

---

From: Zeljer@aol.com  
Date: Sat, 10 Mar 2001 14:51:45 EST  
Subject: Development in Rancho Palos Verdes  
To: Planning@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10501

Realizing that you will be meeting to discuss whether the current coastal development proposal is to go forth or whether the land is to remain as passive park land, we urge you to not be enticed with the developers offer and consider one of our most precious things, that being leaving the little natural land parcels,, as is, for the benefit of future generations. Let's not be short-sighted and develop every bit of land in Palos Verdes, as once it is done, there is no going back. There are good reasons why residents on this peninsula have chosen to live here and it is not to continue to see our land gobbled up by continuing development. We will have lost the special beauty and uniqueness of this part of the world.

Zelda and Jerry Green

**109A**

Zeljer@aol.com, 02:57 PM 3/10/01 -0500, Development in RPV

---

From: Zeljer@aol.com  
Date: Sat, 10 Mar 2001 14:57:55 EST  
Subject: Development in RPV  
To: Finance@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10501

We urge you, in your deliberations, not to be enticed by the current developer's offer to use what could remain public land.

We must continue to save our beautiful peninsula from the bulldozers and maintain the natural coastal landscape that we residents were attracted to when we purchased our homes in Palos Verdes. Please look toward the long-term future and keep this land as a passive park.

Zelda and Jerry Green

110A



**COMMENT NO. 111**

**Daniel F. and Margaret Ann Gruen  
10 Via Malona  
Rancho Palos Verdes, CA 90275  
310-544-9800  
310-544-1299 Fax  
Dangruen@aol.com**

**RECEIVED**

APR 03 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

March 30, 2001

Fax: 310-544-5291

**Re: The Long Point Resort**

Dear Mayor, Members of the City Council and Planning Commission:

This letter is to let you know that we enthusiastically support the Long Point Resort Project for the following reasons:

- We would enjoy having a quality facility in our area for entertaining our friends, family and business associates.
- The eleven miles of new pedestrian and bicycle trails.
- The five new public parks and scenic viewpoints.
- The \$4.5 million in tax revenues generated for the city annually.

As residents of the Palos Verdes Peninsula since the 1960's we understand and appreciate the delicate balance between preserving the natural beauty of the Peninsula and yet carefully developing the area in ways that complement and enhance these surroundings. We feel that with your careful guidance this project can do both.

Thank for your consideration.

Best Regards,



Dan and Margaret Gruen

**111A**

## PUBLIC COMMENT FORM

MAR 15 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

## NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

MARIA C. GUERRA M.D.

11 VIA SAN REMO

RPV CA 90275

Telephone Number:

310-544-2245 (H)

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

The most valuable factors to live in RPV can be threatened by the construction:

1 - Increase Traffic = Pollution and noise  
AIR Quality will change

2 - Increase Waste Water

3 - Loss of Public Lands and change  
completely the landscape view

4 - ↑ noise & ↑ in one of few lands  
left in Southern Cal. so peaceful

5 - Loss of views

6 - Outdoor lighting will change  
the view & peacefulness of the  
BAY.

7 - Public access to Recreation (private)  
IMPOSSIBLE to restrict attendance  
of people coming from other  
areas. Increase waste etc

8 - Impact on soil stability

9 - TRASH Enclosures next to villa CAA

1121

100% ↑ Traffic → Increase  
of safety & already problems  
coming out of the villa.

HOOT  
150

n.a. modat

112A

112B

112C

112D

112E

112F

112G

112H

Les Evans, 11:02 AM 3/12/01 -0800, Fwd: RE: THE LONG POINT RESORT

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 12 Mar 2001 11:02:33 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: RE: THE LONG POINT RESORT

Reply-To: "William Gussman" <gwenandbill@earthlink.net>  
From: "William Gussman" <gwenandbill@earthlink.net>  
To: <CityCouncil@rpv.com>  
Subject: RE: THE LONG POINT RESORT  
Date: Mon, 12 Mar 2001 10:37:52 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2919.6600

DEAR MAYOR, MEMBERS OF THE CITY COUNCIL AND PLANNING COMMISSIONERS:

WE ARE VERY MUCH IN FAVOR OF THE DEVELOPMENT OF THE LONG POINT RESORT. WE HAVE BEEN LIVING HERE IN ABALONE COVE FOR FORTY-TWO YEARS. WE ARE TIRED OF LOOKING AT THE WEEDS & OLD GRAY PARKING LOTS ON THE FORMER MARINELAND SITE. A BEAUTIFUL, GREEN GOLF COURSE & ATTRACTIVE HOTEL THAT WILL BRING THE CITY REVENUE WILL BE MOST WELCOME. WE, & MANY, MANY OTHERS WE FEEL CERTAIN ARE LOOKING FORWARD, ALSO, TO WALKING ON THOSE TRAILS THAT WILL BE PROVIDED FOR THE PUBLIC.

113A

THANKING YOU IN ADVANCE FOR GIVING THIS YOUR UTMOST CONSIDERATION,

BILL & GWEN GUSSMAN  
!! PACKET ROAD  
RANCHO PALOS VERDES, CA 90275-5827

PHONE NO. (310) 377-1419

E-MAIL ADDRESS: [gwenandbill@earthlink.net](mailto:gwenandbill@earthlink.net)

Les Evans, 03:54 PM 3/13/01 -0800, Fwd: RE: YOUR ANSWER TO OUR E-MAIL TO THE CITY COUNCIL

X-Sender: LesE@207.238.114.197  
 X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
 Date: Tue, 13 Mar 2001 15:54:29 -0800  
 To: davids@rpv.com  
 From: Les Evans <lese@rpv.com>  
 Subject: Fwd: RE: YOUR ANSWER TO OUR E-MAIL TO THE CITY COUNCIL WITH  
 YOUR QUESTION TO US RE: LOSING CITY OWNED LAND

Reply-To: "William Gussman" <gwenandbill@earthlink.net>  
 From: "William Gussman" <gwenandbill@earthlink.net>  
 To: <DouglasStern@hotmail.com>  
 Cc: <CityCouncil@rpv.com>  
 Subject: RE: YOUR ANSWER TO OUR E-MAIL TO THE CITY COUNCIL WITH YOUR  
 QUESTION TO US RE: LOSING CITY OWNED LAND  
 Date: Tue, 13 Mar 2001 11:39:22 -0800  
 X-Mailer: Microsoft Outlook Express 5.00.2919.6600

DEAR COUNCILMAN STERN:

THANK YOU FOR ACKNOWLEDGING OUR E-MAIL SENT TO OUR MAYOR & MEMBERS OF THE CITY COUNCIL IN FAVOR OF THE LONG POINT RESORT PROJECT. YOU ASKED IF WE THOUGHT THE CITY SHOULD GIVE UP CITY OWNED LAND TO ACHIEVE THE PROJECT.

THIS HAS BEEN SOMETHING THAT WE HAVE STRUGGLED WITH AT TIMES. IF IT TAKES AN EIGHTEEN HOLE GOLF COURSE TO ATTRACT ENOUGH PEOPLE & ORGANIZATIONS TO PATRONIZE THE RESORT, THEN WE BELIEVE IT IS NECESSARY. SURELY THE CITY NEEDS THE REVENUE. THE SLIDE AREA MUST EAT UP SOME OF THAT REVENUE, PLUS OTHER ITEMS IN THE CITY NEEDING MAINTENANCE, NOT TO MENTION THE UNFORESEEN IN THE FUTURE.

AS TO THE VEGETATION & WILD LIFE ON THE PENINSULA, THERE ARE CANYONS, GULLIES & THE SLIDE AREA, TO NAME A FEW AREAS WHERE NO DEVELOPMENT IS POSSIBLE, & THE HABITAT CAN BE ENCOURAGED TO LIVE & GROW THERE. WE FEEL CERTAIN THERE ARE THOSE PEOPLE WHO REALLY CARE ABOUT THE VEGETATION & WILD LIFE, BUT AT THE SAME TIME, IT BOTHERS US THAT THERE IS A STRONG POSSIBILITY THAT THOSE WHO DON'T WANT THE CITY TO GIVE UP ANY PROPERTY ARE ACTUALLY AGAINST THE ENTIRE LONG POINT RESORT PROJECT & USING THE HABITAT AS THEIR FIGHT AGAINST LETTING ANY OF THE CITY'S LAND GO. THAT'S THEIR PRIVILEGE, BUT WE FEEL THAT WHAT WILL SERVE THE MAJORITY & BRING SOME REVENUE TO THE CITY IS OF IMPORTANCE. THERE ARE POSSIBLY THOSE, ALSO, THAT MAY FEEL "I'VE GOT MINE" & JUST DON'T WANT TO SHARE THIS BEAUTIFUL AREA WITH PEOPLE WHO DON'T LIVE OR WORK ON THE PENINSULA. MANY HAVE BEEN ABLE TO BUILD OR BUY ON THE PENINSULA DURING THE FORTY-TWO YEARS WE HAVE LIVED HERE & WOULDN'T BE HERE IF THEIR DEVELOPMENTS WEREN'T ALLOWED.

THE FORMER MARINELAND WAS HERE SIX YEARS BEFORE WE MOVED HERE & THAT PROPERTY IS STILL COMMERCIAL PROPERTY. MILLIONS CAME TO THE PENINSULA TO

114A

PATRONIZE MARINELAND. LET'S NOT DO TO THIS PROJECT WHAT WE DID TO MR. MONAGHAN'S PROJECT YEARS BACK UNTIL THE MAN WENT BANKRUPT.

PLEASE DO WHAT IS BEST FOR THE MAJORITY & THE CITY'S FUTURE. THANK YOU FOR THE WORK & SOUL SEARCHING YOU MUST BE DOING WITH THIS PROJECT. OUR THANKS TO ALL THE COUNCIL MEMBERS.

BILL & GWEN GUSSMAN

114A

Robert C. Haase, Jr.

RECEIVED

MAR 28 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 27, 2001

City of Rancho Palos Verdes  
Department of Planning  
Building and Code Enforcement  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, California 90275  
Attention: Mr. David Snow, AICP

Re: Pt. Vicente Environmental Impact Report

Dear Mr. Snow:

It is submitted that the EIR, presently being considered by the Planning Commission is irreparably flawed.

The terms *environment* or *environmental* are defined in Webster's, 9<sup>th</sup> Collegiate Edition (1988) as:

1. the circumstances, objects or conditions by which one is surrounded;
2. the aggregate of social and cultural conditions that influence the life of an individual or community.

Thus, we are considering the impact of the Long Point resort upon both our physical surroundings and its intangible effects upon our lives and our society - now and in the future.

Our considerations are especially grave because the proposed private commercial development proposes to utilize 64.9 acres of public parkland.

This parkland is held in trust by the City in perpetuity for public park and public recreational purposes under the express provisions of the deed of the United States to the city of Rancho Palos Verdes. The deed of the "Pt. Vicente Park Site" was recorded as document no. 79-1370945 in the Official records of the Los Angeles County on December 6, 1979.

Fidelity to the City's trust obliges it to summarily reject the inclusion of public parkland in York Long Point Associates development. This duty is magnified when we consider the increasing need of our urban society to have ready access to a natural setting for refreshment and renewal.

This need was recognized long ago by Frederick Law Olmsted, designer of New York's central Park. He had the vision to understand that natural surroundings positively effect human behavior. In the forward to his 1973 biography, author Laura Wood Roper notes:

Under the impact of Olmsted's thought and practice, landscape design shifted its sights from decorative to social aims; land was to be arranged not only for scenic effect but to serve the health, comfort, convenience, and good cheer of everyone who used it.

Important to our considerations is the forfeiture clause in the deed which provides that if the City should fail to utilize the land for "public park and public recreation purposes";

... all right, title or interest in and to the said premises shall revert to and become the property of the Grantor ...

IS NOT A MISAPPROPRIATION OF THE PUBLIC PARKLAND FOR THE BENEFIT OF A PRIVATE DEVELOPER OR ITS REVERSION TO THE FEDERAL GOVERNMENT A MOST PROFOUND, ADVERSE ENVIRONMENTAL IMPACT?

The term "public" is defined in Webster's as:

of, relating to; or affecting all the people; ... of, relating to, or being in the service of the community ...; accessible to or shared by all members of the community ...

We object to the use of the expression "Public-Use Golf Course" and "Public - Play Golf Course" EIR (pg 3-17), to describe the proposed use of the major portion of the upper Pt.

115A

March 21, 2001

Page 3

Vicente Park site. This is an untrue, intentional mischaracterization of the intended use of the land if - as we understand - the golf course will be under long term lease to and controlled by the hotel - available principally, if not eventually, exclusively, to its "guests." The public will not be able to set foot on this golf course unless they trespass and are subject to civil and criminal sanctions.

Now, generally addressing in part the EIR dated July 18, 2000:

Consideration of this environmental Impact Report is irregular and probably illegal because the private developer does not own the acre upper Point Vicente property - nor can the City convey this parkland under the terms of its grant from the Federal Government.

Without mandate and overlooking the public interest, on August 27, 1997, the City wrote York Long Point Associates: "... the city counsel held a pre-screening workshop on the plan you proposed for the development of the Long Point Property." Continuing the City provided the developer its "letter to intent":

In carrying out the council's July 10, 1996 direction,  
this will serve as the City's permission for you to  
include City owned or leased properties in your  
development applications.

Implementation of the proposed project would require a General Plan Amendment to change the land use designation from Recreational Passive to Recreational Active. Such a change in land use would be contrary to the resident's intent and objectives when they founded this City and adopted its General Plan. It would be contrary to the public interest now and forever.

Significant long term impacts to the community are glossed over or not specially discussed in the EIR. These include and conclude:

LIGHT & GLARE, Section 5.1  
The EIR states at ¶5.1-5:

No mitigation measure are required.

115A

115B



March 21, 2001

Page 4

This is followed by the unsupported conclusion at page 5.1-31:

no significant impacts related to aesthetics/light and glare have been identified following implementation of mitigation measure . . .

115B

What is the meaning of “significant” and the expression “implementation of mitigation measures”?

The fact is that this 550 room hotel 32 resort villas, massive entertainment centers, extensive commercial activity, etc. will have a very substantial adverse affect upon our area - urbanizing and commercializing a present tranquil, natural and scenic environment.

LAND USE AND RELEVANT PLANNING, Section 5.7

The EIR states at ¶ 5.7-6 that no mitigation measures are required and concludes that no impacts have been identified.

115C

Nonsense, it is sought to amend the General Plan - to alter the rural character of this land forever.

This is a suburban residential community that is treasured for its peace and distance from urban degradation, noise and industrial and commercial activities.

NOISE, Section 5.9

Here the EIR acknowledges that significant unacceptable permanent long term ambient noise levels would be created and that the City would be required to prepare a “Statement of overriding considerations” in accordance with Section 15093 of CEQA. it does not suggest what such overriding considerations might be. We can be certain, however, that they would not be in the public interest.

115D

The fact is that the noise generated by operational activities by some 700 employees 24 hours a day, 7 days a week by traffic (residents, visitors, delivery trucks, maintenance equipment, music, employees, etc.) would be more than significant and impose a gross adverse environmental impact upon the community.

March 21, 2001

Page 5

TRAFFIC AND CIRCULATION, Section 5.12

The EIR concludes at page 5.12-47 that "no significant impacts related to Traffic and Circulation have been identified following the implementation of mitigation measures . . ."

The mitigation measures referred to in paragraphs 5.12-1a through 5.12-1 and otherwise at pages 5.12-45 and 46 of the EIR are cosmetic gloss.

There are no mitigation measures which could lessen the very substantial adverse impact upon circulation surrounding the proposed project and at principal avenues of entry and exit from the development and city, particularly:


Palos Verdes Drive West at Malaga Cove  
Hawthorne Blvd. at Peninsula Center  
Palos Verdes Drive South at 25<sup>th</sup> and Western  
First Street at Western

Again, the General Plan should not be amended to accommodate traffic congestion on the peninsula reminiscent of that we confront elsewhere and desire to escape from. The City has a duty to its residents and visitors to prevent this happening. It has no duty to accommodate the developer's goal of maximizing profits to the detriment of our residents - indeed all citizens.

Those more knowledgeable will comment upon other sections of the EIR.

The writer's observation is that before taking up the time of the City staff, commissioners, other governmental officials and our residents that the City Council should first address whether they are going to persist with the idea of giving away the public parkland or not - unequivocally and immediately. We have a right to know where they stand on this issue NOW.

Very truly yours,

  
ROBERT C. HAASE, JR.  
20 Sea Cove Drive  
Rancho Palos Verdes, CA 90275

RCH/Deb

115E

115F

Les Evans, 05:28 PM 3/13/01 -0800, Fwd: RE:The Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 13 Mar 2001 17:28:44 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: RE:The Long Point Resort

Date: Tue, 13 Mar 2001 17:18:31 -0800  
From: Marilee Hagerthy <marileeh@pacbell.net>  
Subject: RE:The Long Point Resort  
To: citycouncil@rpv.com  
X-Mailer: Microsoft Outlook Express 5.50.4133.2400

Dear RPV City Council Members,

My husband and I wish to express our support of the Long Point Resort proposal. We feel our community has much to gain from this project and feel this resort would definitely be an asset to our city, adding millions in much needed revenue. According to the DEIR this is a an environmentally sound development, and will actually give more access to bluff top trails and bike paths as well as beach access. Also the improvements to the City Hall property, along with the golf course, will restore a great deal of the natural habitat.

We have been residents of RPV for almost 19 years and have been waiting for the last 15 of those years for a Resort like this to be built!

Please move forward as soon as possible to approve this project and let's get going on a beautiful new addition to our city. We are very excited about all aspects of The Long Point Resort.

We are very sorry that we cannot attend the meeting this evening but hope you will include our email in your consideration.

Thank you for all you do for our city!

Sincerely,  
Mike & Marilee Hagerthy  
29348 Stonecrest Road  
RPV, CA

116A

APR -3 2001

March 31, 2001

Mayor Lyon,  
Members of the City Council and Planning Commission  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

RE: THE LONG POINT RESORT

Dear Mayor, Members of the City Council and Planning Commissioners:

Please consider approval of the planned girls softball complex at the Long Point Resort site.

Girls of all ages in softball would benefit greatly from having suitable facilities and from witnessing the solid support of the community. It would also encourage further participation in the sport, which would develop into a lifetime love of sports, fitness, and a healthy lifestyle.

The full-sized fields, the parking, the walking paths, and the location are all positive aspects of the plan. The families would benefit by spending hours in such a beautiful setting.

Thank you for your consideration of this softball complex for our girls and for the generations of peninsula girls to come.

Sincerely,



Gretchen A. Harris

4008 Via Gavilan  
Palos Verdes Estates, CA 90274

gh.songs@gte.net

117A

**Les Evans, 01:29 PM 3/28/01 -0800, Fwd: Use of city hall and upper point vicente park property**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 28 Mar 2001 13:29:56 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Use of city hall and upper point vicente park property

From: Jim Hathaway <Jim.Hathaway@trw.com>  
To: CityCouncil@RPV.com  
Subject: Use of city hall and upper point vicente park property  
Date: Wed, 28 Mar 2001 08:07:32 -0800  
X-Mailer: Internet Mail Service (5.5.2650.21)

Dear Mayor Lyon and city councilmembers-

We would request that you seriously consider the alternative recreational uses for the city land in the upper Point Vicente park area. The nice flat area would be a great place to create a recreational sports complex, with soccer fields, softball diamonds, and/or general playground activities. This would allow the general population the ability to enjoy the public property in the way the original city founders envisioned. Coupled with the educational trails and scenic vistas proposed by the SOC2 committee, you could really create a wonderful active and passive recreation area.

Thank you for your consideration.

Jim Hathaway  
Sachie Hathaway  
Erika & Alisa

**118A**

February 13, 2001

COMMENT NO. 119

FEB 15 2001

Dear Mr Evans,

Please add another voice to the  
large list before the Council.

I am totally amazed and confused  
that the Council should continue  
to consider York Enterprises' plan to  
use PUBLIC land for their golf course.  
Surely by now the Council have heard  
sufficient opinions from the public,  
S.O.C II, etc to realize any such take  
over of land belonging to the people  
of Rancho Palos Verdes has absolutely  
no backing in the community.

It seems sad that the Council  
should continue to spend time -  
however voluntarily given - on the  
subject. Does the City really  
need money so badly? How pathetic.

Sincerely

Pine Tree Road  
RPT, CA 90275.

David Heller

119A

March 27, 2001

APR -2 2001

Dear Mayor Lyon,

As you suggested in your letter of February 16, I have given more thought to the proposed use of public land adjacent to City Hall for part of the Long Point Golf Course.

I am still totally against such a proposal, but I am very enthusiastic about your idea to use some of the flat land for baseball, soft ball, soccer, etc. The people of R.P.V. would be able to use these facilities and there would be enough of the rugged ground to be enjoyed by the community for walking and observing the native flora and fauna — the views from that area are spectacular. (I saw a red fox on the road by the lighthouse

120A

early one morning - it high tailed it  
to safety up the hill!)

In view of the proposal to build  
yet another golf course over at the old  
Chandler site in Rolling Hills Estates,  
Surely, we don't need yet another in  
this city.

I was not troubled by Councillor Lord's  
remarks that should Mr. York be  
allowed Public land for 5/6 golf  
holes, he might then reduce his  
price per acre of the land around  
Portuguese Bend.

So please encourage your fellow  
Council people, and the Planning  
Commission, to adopt your proposal.

Sincerely,

Bridget Heller

BRIDGET HELLER  
9 FRUIT TREE ROAD  
R.P.V.

120A



**Les Evans, 04:50 PM 4/2/01 -0700, Fwd: Long Point**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 02 Apr 2001 16:50:16 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point

Date: Mon, 02 Apr 2001 16:09:42 -0700  
From: judith herman <judyherman@home.com>  
User-Agent: Mozilla/5.0 (Windows; U; Win98; en-US; m18) Gecko/20010131 Netscape6/6.01  
X-Accept-Language: en  
To: CityCouncil@RPV.com  
Subject: Long Point

Judith Herman  
30539 Rhone Dr.  
Rancho Palos Verdes, CA 90275  
April 2, 2001

Dear City Council Members:

Please don't trade our natural heritage for a mess of casitas and golf balls. There is no reason to donate city land to Long Point developers. It's tempting to go for any proposition that seems to offer more revenue for the city, but as the Palos Verdes Peninsula News points out, the city has plenty of money. Once development takes place no amount of money can recover precious natural habitats and the spacious, semi-rural atmosphere that makes living in Rancho Palos Verdes a pleasure and maintains our property values.

Save Our Coastline II has the best plan for the area around city hall. Their concept is the same as the original proposal, made 25 years ago, that convinced the National Park Service to turn over the federal Nike missile site to the new City of Rancho Palos Verdes.

SOC II has the support of many community groups, including the Palos Verdes Peninsula Land Conservancy and the Audubon Society, who have pledged to preserve or restore native habitat and educate students and others in the process. SOC II envisions a series of trails to provide access to areas for solitary contemplation of the beautiful view sheds of coastline and ocean or for more social activities. They also see other areas for more active recreation.

This plan would include the entire community, not just golfers willing to pay high greens fees. Destination Resorts claim they would include trails around their golf course, but the city would have to choose between ugly fencing or the liability for trail users injured by flying golf balls.

As the PV News said in its February 10 editorial: "We favor SOC II's alternative, which entails restoring the area's coastal sage scrub habitat without the massive impact that a development would have...[J]udging by the number of letters we've received from across the Peninsula, many people want to preserve open land like Upper Point Vicente. City officials would do well to listen to these people, as they are the ones the federal government had in mind when it deeded the land."

**121A**

Keep up the excellent work you have begun in preserving open natural space in our city. Thank you.

Sincerely,

Judith B. Herman

**121A**

**COMMENT NO. 122**

April 2, 2001

**To: Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275**

**Re: The Long Point Resort**

**Dear Mayor, Members of the City Council and Planning Commissions:**

**The purpose of my letter is to join in with my support for The Long Point Resort project. Upon reading several pieces of information, I find that the proposal would add greatly to the community, coastline and local business support as well as add opportunity for local residents to gain employment.**

**The developer has demonstrated a will to reach out to the community and modify some of the original proposed plans to meet the requests from the community, i.e., a nine hole golf course instead of an eighteen hole course and protecting the existing wildlife habitats as only two examples. I also believe that the revenues from this new tax source would greatly add to the economic soundness and help the city-at-large.**

**I believe this project will add beauty to the coastline for many years to come and provide access to the public for enjoyment.**

**I fully support this project and hope that the Mayor and Members of the City Council and Planning Commission will work with representatives of The Long Point Resort to fulfill this opportunity of growth in Rancho Palos Verdes.**

Sincerely,



**Patricia K. Hewitt  
6750 Los Verdes Dr. #3  
Rancho Palos Verdes, CA 90275  
(310) 377-5136**

**122A**

**JotH@aol.com, 08:51 PM 3/13/01 -0500, Re: The Long Point Resort**

---

From: JotH@aol.com  
Date: Tue, 13 Mar 2001 20:51:00 EST  
Subject: Re: The Long Point Resort  
To: CityCouncil@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10501

Dear Mayor, Members of the City Council and Planning Commissioners:

We are writing to express our support of the Long Point Resort. The development of the old Marineland property, which has been an eyesore for many years, into a first class hotel will be a real win for our community. The tax revenues generated from this project will have many positive effects, and could allow us to fund the reopening of the Point Vincente Interpretive Center. The addition of walkways, park areas and new wildlife habitat will all be of direct benefit to the community. We urge your support of this important project.

Jot and Linda Hollenbeck  
29503 Quailwood Dr.  
Rancho Palos Verdes

**123A**

**Les Evans, 07:40 AM 3/27/01 -0800, Fwd: The Long Point Resort**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 27 Mar 2001 07:40:42 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

X-Originating-IP: [24.13.163.120]  
From: "Edward Hong" <edward\_hong@hotmail.com>  
To: CityCouncil@rpv.com  
Subject: The Long Point Resort  
Date: Mon, 26 Mar 2001 21:53:08 -0800  
X-OriginalArrivalTime: 27 Mar 2001 05:53:08.0773 (UTC) FILETIME=[3338AD50:01C0B682]

Members of the City Council and Planning Commission,

Hi, my name is Ed Hong and I have been a resident of RPV for 11 years. I also grew up on the hill, attending Montemalaga Elementary, Malaga Cove, and PV High School.

I am writing to communicate my support for the Long Point Resort Project. Specifically, I would really like to see the development of the 5 new public parks and trails that the Long Point developer would provide. I have recently learned that the developer would be willing to forego the building of a driving range, and instead develop a recreational facility that would provide a softball complex that is badly needed.

I have many friends who live in Orange County and whenever I visit them, I am truly impressed by the quality and number of parks and recreational facilities that are available to families that live in those communities.

And at the same time, I am embarrassed by the lack thereof of such quality facilities in the Palos Verdes area. The City needs to address this shortcoming.

The Long Point Resort project would provide the much needed parks and recreational facilities for PV residents and at no cost to the city. This is a golden opportunity to meet the needs of the community. Let's not let this opportunity pass us up.

Sincerely,

Ed Hong

---

Get your FREE download of MSN Explorer at <http://explorer.msn.com>

MAR 27 2001

January 27, 2001

Mayor Pro Tem Marilyn Lyon,  
Rancho Palos Verdes City Council,  
30940 Hawthorne Blvd.,  
Rancho Palos Verdes, CA., 90275

Dear Mayor Lyon:

It was a pleasure to have had the opportunity to speak with you briefly at the recent **Point Vicente Park Walkabout** on Sat., March 17th. My wife & I are writing to you as 25 year residents of Rancho Palos Verdes in order to lend our support to the Save Our Coastline 2 initiative that would protect the entire 68 acre parcel of public land that provides such an outstanding opportunity to enhance Upper Point Vicente Park. Luckily we happened to turn on our television just about the time the hearing on those issues was before the members of the RPV City Council and RPV staff. What an impressive evening that was! We deeply hope that you will support the effort to protect all of this extraordinary land for both active & passive recreational uses, including habitat restoration, the development of educational programs for children and young people, the protection of native plant species and wildlife and the many other creative uses that were suggested by some of the speakers at the Walkabout.

125A

While our children are now grown and are living elsewhere, all of us know that we have a special obligation to think of not only this generation but of the many generations to come who depend upon all of us to not only protect but enhance that irreplaceable natural environment that is entrusted into our care. We deeply hope that you will do all that you can to show the kind of leadership and stewardship that is called for on this matter.

Sincerely,



Edward & Joann Hummel,  
6903 Hartcrest Drive,  
Rancho Palos Verdes, CA., 90275-2933  
310) 541-6986  
edjohummel@loop.com

Tuesday, March 13, 2001

To the planning commission and all other interested parties,

We are very sorry not to be able to attend in person tonight as we believe this is such an important, irreversible decision.

We would like to voice our complete support of the SOC II proposal either as it stands or with modifications.

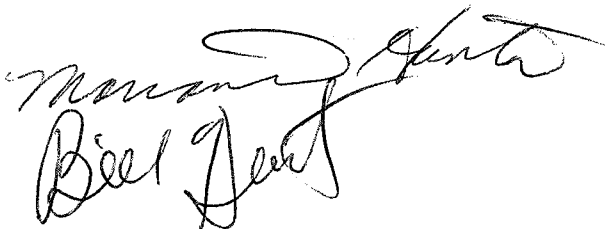
We wish to make it known that we are absolutely against any private and for profit use of RPV's public lands and we are equally committed to the protection of what little native habitat remains in our area.

We have spoken and written at length for our reasons for supporting these positions. We are certain others will make the case tonight. We urge you to PLAN THIS CITY AS IT'S CITIZENS HAVE DECLARED THEY WISH IT TO BE. WHAT POSSIBLE GROUNDS COULD YOU HAVE TO DO OTHERWISE IN THIS MATTER?

Thank you for doing the only right thing.

Sincerely,

William and Marianne Hunter  
1 Cinnamon Lane  
Rancho Plaos Verdes, 90275

Handwritten signatures of Marianne and Bill Hunter. The signature 'Marianne' is written in a cursive script, and 'Bill' is written below it in a similar style.

Submitted at P.C. Hearing:  
3.13.01

126A

Les Evans, 09:17 AM 3/26/01 -0800, Fwd: Pt Vicente/Public Lands

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 26 Mar 2001 09:17:53 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Pt Vicente/Public Lands

Date: Mon, 26 Mar 2001 09:27:04 -0800  
From: Marianne <hunter2@inreach.com>  
Reply-To: hunter2@inreach.com  
X-Mailer: Mozilla 4.5 (Macintosh; I; PPC)  
X-Accept-Language: en  
To: CityCouncil@RPV.com  
Subject: Pt Vicente/Public Lands

Dear Council Members,

Since the last few Council meetings we are somewhat encouraged that the Council may indeed be shifting toward a more responsive position with it's constituency. We congratulate us all if we can work together towards a common goal of refining and protecting what we have and what we desire for our city, with the long view in mind.

Regarding the public owned land at City Hall and it environs; It seems to have been stated very clearly, almost unanimously, that the citizens of Rancho Palos Verdes are FOR keeping public land completely public and, at the same time, preserving and refining it's natural attributes and benefits for all the people and for the creatures within it's habitat.

The proposal by the SOCII Committee seems desirable, reasonable and feasible. We do believe that volunteerism will help to put such a plan into action . Of course, there may be alterations to this proposal or even other proposals put forth, but it seems the will of the people of this city that this type of proposal is what they want and what they are willing to fight for , even against the money of a large development. The citizens who elected you to represent their interests are counting on you to fulfill your promises to them.

Sincerely,

William ands Marianne Hunter, RPV

127A



25930 Rolling Hills Road, #403  
Torrance, CA 90505

FEB 20 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

February 16, 2001

Mr. David Snow  
RPV Department of Planning  
Building & Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Dear Mr. Snow:

I am writing to register officially my opposition to the development of the Long Point Resort.

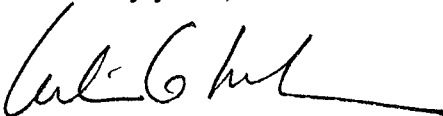
Our community does *not* need another golf course and hotel. It is tragic what has happened to the rolling, spacious green hills of the PV Peninsula. Over the past 30 years we have watched green hillside give way to one hideous housing development after another. Developers have destroyed the natural beauty of one of the most spectacular sections of coastline in the State of California.

I am in full agreement with the opponents of using open public lands for private development. This is *not* in the best interests of the community. It only benefits the well-off few.

Please forward my comments to other committee members. I hope that a compromise can be reached. Long Point can be developed as a public park with picnic sites, beach trails and wildlife preserves, so that future generations can share what was and is, for me, one of the best reasons to be a resident of the Palos Verdes Peninsula.

Thank you for your time and consideration.

Sincerely yours,

  
Leslie G. Jacobs

128A

Dear Mayor Lyon,

I am twelve years old, and this is my second year playing softball. We don't have enough softball fields for the number of girls that want to play. We need more fields so we can all play together.

Please help us build some new fields for the girls softball league.

129A

Sincerely,

Bernadette  
Jamison

My Address:

14 San Clemente Dr.  
RPT, CA 90275

**Les Evans, 11:58 AM 3/27/01 -0800, Fwd: Re: Upper Point Vicente Use**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 27 Mar 2001 11:58:32 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Re: Upper Point Vicente Use

From: CassieJ@aol.com  
Date: Tue, 27 Mar 2001 13:04:53 EST  
Subject: Re: Upper Point Vicente Use  
To: citycouncil@rpv.com  
X-Mailer: AOL 5.0 for Windows sub 40

Dear City Council Members,

I have been reading a lot about the desire to use a portion of Upper Point Vicente Park as a golf course. I already see a lot of golf courses around here. I do not play golf, so they are of no use to me. I would enjoy the Upper Point Vicente Park more if it had some good hiking and nature trails, picknicking areas and, perhaps, a space to allow dogs to run off-leash. I am sure the non-profit Peninsula Dog Park organization would be more than happy to help with the planning, design and care for such a place. The number of residents in this city with dogs is, I am sure, tremendous.

I have to think there are other residents, who, like me, really have no use for another golf course. Please take the time to consider the actual needs and desires of the residents before giving our land up for more golf.

Cassie Jones  
40 Cinnamon Lane  
Rancho Palos Verdes

**130A**

Les Evans, 08:03 AM 3/12/01 -0800, Fwd: The Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 12 Mar 2001 08:03:42 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

Date: Sun, 11 Mar 2001 12:24:49 -0800  
From: kapp <makapp@home.com>

To: CityCouncil@rpv.com, mafoard@yahoo.com  
Subject: The Long Point Resort

Dear Mayor, Members of the City Council and Planning Commissioners:

At long last, we'll have a top-notch facility here in RPV where the community can hold events such as high school proms and the Main Event...a place where I can take the family for brunch overlooking the ocean...where I can attend an anniversary celebration. That's what the Long Point Resort offers.

I understand that existing wildlife habitat areas will be protected and new habitat added as a result of this project. Some 30 acres -- all at no cost to the city. The protection of the face of the bluffs and native plants in the area is very important. I'm glad that the Long Point Resort developers understand this and have designed a plan that does so.

Just think of all the benefits that the Resort will bring to the public. New public parks and trails. Improved pathways to the ocean. Picnic areas. A public golf practice facility and golf course. Jobs and tax revenue. Let's bet behind it, not meddle with it!

Emphatically,

Mary Ann and Joe Kapp

131A

MTA Revenue Department Fax: 213-922-7666

Apr 4 '01

8:29

P.01

Frank and Lea Kenny  
29307 Quailwood Drive  
Rolling Hills Estates, Calif. 90275

30 March 2001

Lyon, Members of the City Council  
Planning Commission  
Rancho Palos Verdes  
Hawthorne Blvd.  
Palos Verdes, Calif. 90275

Mayor, Members of the City Council  
Planning Commissioners:

support the Long Point Resort development with a few reservations. The old Marineland property  
is an eyesore for the almost 11 years that we have been Peninsula residents. Let's build this first  
resort which will beautify the area, bring facilities to our area for all residents to use and enjoy and  
tax revenues to help maintain city infrastructure.

132A

are some aspects to the plan that we object to. Why does the Resort need to consume precious  
unique acreage for a golf practice facility? It's not necessary, hard to conceal and will probably  
light pollution at night. Also hopefully there is a provision in the development plan that will pre-  
vent use of helicopters from delivering guests arriving from LAX. Anyone who has experienced the  
noise and disturbance caused by helicopters serving tourists at the South Rim of the Grand Canyon will  
understand the need to prevent this in our area.

132B

132C

Finally, if the development is approved and moves forward, can the City enlist the help of the construc-  
tion industry to dress up the appearance of RPV City hall and change the military barracks look to some-  
thing more pleasing to the eye?

132D

appreciate your consideration of our ideas.

Sincerely,

  
Frank Kenny

  
Lea Kenny

RECEIVED

MAR 20 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

cc. RPV City Council

*The Long Point Resort*

*A beautiful addition to the Rancho Palos Verdes community*

- ☐ YES, I support the resort project, which will provide both environmental and economic benefits to the community.
- ☐ YES, you can list my name/organization as a supporter of the project.
- ☐ YES, I'd be glad to help by:
- ☐ Participating in public hearings.
- ☐ Writing a letter to decision-makers.
- ☐ Arranging for a presentation to my civic organization.
- ☐ I NEED TO KNOW MORE. Keep me informed about the project.

☒ No ... A RESORT IS UNWELCOME

Name HOWARD KING

Address 6753 VALLON DRIVE

RANCHO PALOS VERDES, CA 902

Phone \_\_\_\_\_ (day)

(evening)

Comments PLEASE ENSURE THAT

RPV COUNCIL KNOWS THAT

SOME PEOPLE CONSIDER LONG

POINT AN UNWELCOME INTRUSION

COMMENT NO. 133

133A

J: THE PLANNING COMMISSION  
 FROM: JIM KNIGHT *56 W. Main St. W., RPU 90275 Jim-Knight@LANG.com*  
 DATE: MARCH 13, 2001  
 RE: DEIR FOR THE LONG POINT PROPOSAL

To the planning commission:

I am still in the process of reading and commenting on the DEIR for the Long Point Proposal. The following are a few comments and questions that I have extrapolated for your consideration.

### SCOPE OF THE DEIR

First and foremost, the scope of the "project" that is before you is misleading. The DEIR defines the project as being comprised of 168 acres yet 65 acres, or 38% of the total project, is publicly owned land. This means the entire DEIR is analyzing benefits, impacts and mitigations of land the developer does not own, have any control of or even know if it can be included in the "project".

And, by co-mingling private/public lands in this DEIR, the publicly owned open space is being used as mitigation for the impacts of their own private development plan. This leads to conclusions and mitigation strategies that should not be in the pervue of the DEIR. It is no different than a private land owner using a nearby National Forest for EIR mitigation of their own development project. No matter how well the Best Management Practices (BMP) mitigates that development, it is not being mitigated independent of that National Forest and therefore is not being mitigated as a separate project.

All of the mitigation credits of parks, miles of trails, biological resource restoration figures of the Long Point DEIR are at the expense of the lands in the public trust and constitutes a public hand out. This DEIR does not address the fact that, for the entitlement of one developer's idea of a project, these public land are being forever stripped of its fully restorable potential and the numerous biological and cultural benefits it has to offer to this community. That is one colossal impact.

The appropriate scope of the developer's project should be on the private Long Point site excluding these public lands. The developers are sophisticated investors who purchased the Long Point site with a well thought out RTC bid based upon its existing entitlements. Since that purchase, surrounding amenities that are additional benefits to the hotel have been put into place including a world class golf course at Ocean Trails. Their own market analysis on p.4 says Ocean Trails provides a suitable recreational infrastructure, formal or informal, for the Long Point guests. I don't know why all of a sudden they "need" these public lands.

What if I came to you and said I need 38% of Hess Park for a golf course so that I can make a go of my project next door? You would probably say I paid fair market price for the land with existing entitlements and I should make a go of it on my own.

134A

Submitted at P.C. Hearing

3-13-01

There is no difference with the proposal before you that requests to use City Hall parkland for the Long Point development proposal.

The hotel does not have to be attached to these parklands. Both a nice hotel can be built on their own site and a Park Enhancement Plan can be implemented on the city hall property. They say it won't fly without the golf on parklands. They said the same thing with 18 holes of golf. There is a world class hotel built 10 miles outside of Acapulco called the Mayan Inn. It does not have any golf course on site and it is flying with colors just fine with a full house.

Why do they say they "need" golf on public lands? I think the answer is that they are in the speculation business all over again trying to get more than they bought originally. The city hall land has no acquisition costs, so why not ask?

And since they have bought the Marineland parcel at the RTC auction, many amenities have been built to make their original investment even better. To name one, Ocean Trails just a short shuttle ride down the road for their golf guests.

As a matter of fact, the Park Enhancement Plan Alternative would benefit the Long Point development. Not only will they save the millions of dollars it costs to build and maintain a golf course, they would be freed from the restoration costs. And all of the hotel residents would be welcome to enjoy the fully restored parkland, not just golfers.

On Jan. 16, 2001, the City Council passed a resolution withdrawing permission to use public parkland and directed the developer to put forth a full analysis of the development of Long Point on its own merits. I respectfully request this commission do the same.

134A

### **NCCP AND THE LONG POINT PROPOSAL**

The NCCP is a wonderful program establishing habitats for threatened species as well as passive recreational opportunities for the community. The key to its biological success is setting aside large, contiguous areas for that habitat and establishing core linkages between areas within the NCCP boundaries.

The resource agencies have repeatedly commented that the golf plan on the city hall property creates NCCP planning problems with its fragmentation of habitat. Other biologists and botanists have added their concern with the grading, revegetation plan and chemicals needed for golf greens.

This has led to a stalemate with the Resources Agencies, biologists and botanists who are trying to design a long term, functional habitat plan under the guidelines of the NCCP.

We need to take the golf component out and reinstate the critical habitat area on the City Hall property back into the reserve design so that we can move the NCCP forward and open the door to the rapidly diminishing funds from Prop. 12 for acquisition of natural open space in other areas such as Portuguese Bend.

134B



## **QUANTITY VS QUALITY OF HABITAT**

The DEIR states that the project increases the quantity of habitat. But when one looks at the DEIR tables showing a net increase of habitat, one must keep in mind that quantity has nothing to do with quality of habitat.

The "new" habitat will not function as well as large, contiguous areas of habitat, such as found in the Park Enhancement Plan. Scraping and moonscaping existing vegetation then re-planting habitat takes years for the microbiology of that ecosystem to re-establish. Removal of microbes from the soil can effect plants which effects insects which effect small animals which effect raptors, etc. all of the way up the food chain. A slow, careful restoration of existing habitats with the Park Enhancement Plan has far less impact to the ecosystem.

Fragmentation, edge effects, grading, golf green chemicals and a slurry of human impacts with golf activities could push the threatened gnatcatcher over the brink of extirpation from the site entirely.

134C

## **IMPACT TO COMMUNITY WITH EXCLUSIVE GOLF USE**

A fundamental question before this and other commissions is: should this parkland be used for golf? Should the opportunity for the public to fully restore habitat in this parkland, enhance trails throughout the park, preserve the biological and cultural heritage and provide educational opportunities for their children, help further the NCCP to help acquire other open spaces, in the interest of 100% of the community, be preempted by a developer who wants to further his own development by placing a restricted use of this parkland?

The DEIR has not analyzed this fundamental land use change and its impact to the community.

If you read the financial report prepared by the developer, you will find that approximately 10% of the general population play golf, and of that 10%, only 10-20% play high-end golf. The golf proposal for the Upper Point Vicente Park is high-end. This means that most of the park will be taken away from 98% of the community for exclusive use by that 2% of the general population that play high-end golf.

This does not fulfill the deed requirements of the Dept. of Interior, nor should it be a part of any policy set forth by this Commission. The developer is also asking for an amendment to the General Plan to accommodate his "project".

Being in a position to make decisions that effect the lives of people of this community, you are endowed with the power to determine these important land use issues. The developer is asking this commission, the City and the Dept. of Interior, to bend the rules to meet his "request".

By recommending the Park Enhancement Plan Alternative of this DEIR you would be following the vision set forth 26 years ago in this city's general plan, complying with the Dept. of Interior's deed restriction, leaving this beautiful City Hall land open for all to enjoy while preserving threatened wildlife for future generations.

134D

## Point Vicente Park Enhancement

26 years ago a group of the founding members of this city set forth a general plan. Within that plan was the vision to preserve the natural open space within the city for passive recreational uses. This concept we present tonight is simply the fulfillment of that vision.

Basically this design is just an extension, or enhancement, of what exists now in Point Vicente Park. It would require little effort to implement yet could achieve tremendous benefits for this council and this community.

### Design

The level section adjacent to city hall could retain the current recreational uses including tennis and enjoyment of the large grassy areas. Along the edges that overlook the Point Vicente Lighthouse and Catalina Island there could be benches to enjoy these scenic vistas. There currently is a parking lot next to this area that could facilitate access for seniors and handicapped.

From this level section, a series of passive trails could guide people through the natural habitat. Many of these trails already exist; they just need a little help. Several simple billboard style pavilions with information describing the native habitat could be at the entrance to these trails. There are level sections that are ideal for handicapped and senior access.

There could be the addition of native plant gardens.

A garden containing a variety of California natives could start from the city hall entrance and extend along Hawthorne Blvd. This Calif. Native Garden could become a living classroom for workshops in which homeowners could learn how to revegetate their own urban gardens. Another garden in this same section could contain exclusively P.V. natives to enhance the visitors understanding and enjoyment of the nature trails. This area is also handicapped accessible from the adjacent parking lot.

135A

### Educational component

There is a tremendous educational value to the park habitat. The trails could have signs that describe the native plants and animals as well as historical information.

There are two military installations, the W.W.II bunker to the west and the Nike missile silos to the east, that could have plaques describing their historical significance.

Guided walks through the habitat could be periodically scheduled for the general public depending upon the availability of docents.

The habitat provides a living classroom for our children. There could be an "adopt an acre" program whereby a class, or scout group, would be responsible for restoration of a specific area.

The students could follow the restoration from start to finish, keeping track of its progress including a historical records of plant, bird and insect counts. Restoration projects can tie into the curriculum of the student's school and offer a unique sense of connection with the world around them not offered in traditional textbooks.

## P.V. Blue butterfly

In addition to restoration of coastal sage scrub and southern cactus scrub for the gnatcatcher and cactus wren, native habitat could be restored for the reintroduction of the endangered Palos Verdes Blue Butterfly.

## Volunteer Restoration

There are many volunteer groups in the south bay that could help with this restoration including Audubon Yes, or Youth Environmental Services some members of which include P.V. High School students, Rhapsody in Green, who are responsible for restoring the Blue Butterfly habitat in San Pedro, and the P.V.P. Land Conservancy, which has an excellent track record of restoration projects.

## Possible Future Enhancements

At some point in the future, a modest gallery could house detailed habitat descriptions and display settings for people to get a closer look at the natural environment they will encounter on the trails. Sounds of the gnatcatcher songs and other wildlife could enhance the visual experience.

It could be designed to complement and work in symmetry the new Palos Verdes Interpretive Center.

Conceivably a Native American Indian setting could display in detail how they lived and how they prepared their foods from the native plants. Combined with this display could be scheduling of periodic lecture/demonstrations by Native Americans detailing the indigenous life years ago, including food preparations, stories and traditional songs and dances.

These are only a few of the park enhancements possible that could serve to heighten the enjoyment of this area for the entire community.

## Benefits of Park Enhancement

*Some of the Benefits of Implementing this Concept are:*

⇒ Once the native plants are established, the habitat will not require any water use and is more in line with sensible water conservation plans.

⇒ The Park would be open to 100% of the general population, regardless of income level, and would be in full compliance with the Dept. of Interior's "general public use" deed requirement.

⇒ The Park Enhancement concept does not require any general plan change as it is exactly the use that originally was intended for this land.

⇒ The beautiful vistas along the edges of the bluffs overlooking the Lighthouse and Catalina would be preserved. Under the golf plan these views would forever be restricted from the general public.

⇒ Parks and open spaces provide the largest educational setting outside of schools. As stated earlier, the restoration of the park habitat provides tremendous educational opportunities for our children.

⊞-This concept does not require any use of fertilizer, pesticides, herbicides or rodenticides any one of which could spell disaster to terrestrial or marine habitat.

⊞-There is no disruptive grading or fragmentation of the habitat. In fact this Park enhancement would preserve the habitat in a sound, contiguous plan reinforcing Gnatcatcher and Cactus Wren survival rates. It also helps establish core linkages to other habitat areas increasing the benefits to the threatened species surviving in the area.

⊞-And, most importantly, for the reasons above, scientific peer review of the NCCP from biologists, botanists, and Resource agencies would help advance the NCCP approval process as this is precisely what they have set forth as principles of good habitat planning.

⊞-And, the sooner an NCCP is finalized, the better chance we have of obtaining funding to set aside other areas as natural open space, such as the Portuguese Bend Preserve. And, by the city implementing a habitat restoration plan such as this, the City's credibility with funding agencies to obtain the funds would be advanced even further.

There are no acquisition costs and the enhancement of Upper Point Vicente Park would be very easy and inexpensive to implement.

Benches and signs could be donated by private citizens or businesses with a "donated by" credit. I will even offer to donate the first bench.

It is a simple plan yet it could yield tremendous dividends to the community. And when combined with the Interpretive Center, the Lighthouse, the coastal bluff walk in Subregion 1, the county bluff park, and the Golden Cove center, this area could fill a full day's worth of enriching experiences for the entire family.

### Preserving Our Heritage

California sits atop the list of states where shrinking habitats spell doom for scores of endangered species according to a U.S. Geological Survey. Coastal Sage Scrub has been reduced by 90% and the Palos Verdes Peninsula has some of the only remaining CSS habitat left in Los Angeles County. We must give the highest priority to the preservation of this natural open space for its inherent biological, aesthetic and educational value and of which characteristics defines the peninsula as unique to any other location.

I would think each and every council member would be proud to have a plaque memorializing their achievement in bringing to fruition these precepts set forth in the general plan 26 years ago.

The rich natural habitat in Point Vicente Park provides a treasured place waiting for exploration and learning for young and old for generations to come. It is a part of our natural heritage.

We respectfully request that the council direct the appropriate staff departments to examine this concept and, with their input, and input from the community, move it forward into a fully developed plan.



# Point Vicente Park and Preserve

CSS, R Coastal Sage Scrub - Artemisia Dominated

CSS Coastal Sage Scrub - undifferentiated

SCS Southern Cactus Scrub

S Saltbrush

R Agricultural

R Restoration and/or Revegetation

Nature Trail

Handicapped access

q/p View Point w/ Benches

Interpretive Center

Coast Guard Lighthouse

P.V. Dr South

City Hall

P.V. and CA

Native Garden

Hawthorne P



TO: THE PLANNING DEPT.  
FROM: JIM KNIGHT  
DATE: APRIL 4, 2001  
RE: COMMENTS FOR THE LONG POINT DEIR

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

The following are comments and questions concerning the Long Point Resort Proposal in Rancho Palos Verdes. These are in addition to my comments in the Appendix to this DEIR. (A correction to the publication of my scoping comments in this DEIR Appendix-please include the map as found on the backside of the Endangered Habitats League with my letter of comments dated August 22, 2000.)

**MISLEADING SCOPE OF THE DEIR**

First and foremost, the scope of the "project" is misleading. The DEIR defines the project as being comprised of 168 acres yet 64.9 acres, or 38% of the total project, is publicly owned land. This means the entire DEIR is analyzing benefits, impacts and mitigations of land the developer does not own, have any control of or even know if it can be included in the "project".

By co-mingling private/public lands in this DEIR, the publicly owned open space is being used as mitigation for the impacts of their own private land. This leads to conclusions and mitigation strategies that should not be in the purview of this DEIR. It is no different than a private land owner using a nearby National Forest for EIR mitigation of their own development project. No matter how well the Best Management Practices (BMPs) mitigates that development, it is not being mitigated independent of that National Forest and therefore is not being mitigated as a separate project.

For example, on p. 5.3-42, by commingling UPVA and RHA the habitat numbers are hard to separate out. 80% of the commingled existing habitat is on UPVA.. And when one looks at the private land of the RHA, of the 4.54 acres of existing native habitat, .1 acres will be destroyed and NO restoration to compensate on this private land. This leaves no ratio of restoration on the private land portion. UPVA definitely serves the purpose of providing all of the compensation ratio summarized on this page, yet it is land that is publically owned and the developer has no idea if it can even be included in this project.

The scope of this DEIR that includes public lands throws off the overriding considerations guidelines in CEQA. Because golf on UPVA is part of the "project", then leaving golf out of UPVA would not achieve the objectives of the "project". This circular argument could allow for the Lead Agency to approve the project even with significant unavoidable impacts to public lands even though those public lands have no authorization nor need to be included in the "project".

One of the basic principles of CEQA is that the project description must be accurate and consistent throughout the EIR. This includes economic characteristics. By co-mingling private/public property in the project description, neither decisionmakers nor the public can accurately

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APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

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assess economic characteristics and alternatives for this project. This includes other agencies that have purview over this EIR including the Dept. of Interior.

Generating taxes is one economic consideration, and in the case of this project, the bulk of hotel taxes is from the hotel itself, not golf on UPVA. Yet, since the "project" description includes golf on UPVA there is no way in this DEIR for anyone to accurately separate the hotel's capacity to generate taxes independent of public lands. A false conclusion of overriding considerations could result.

There is no analysis of the merits of the hotel, which is the source of the majority of revenue, on its own without public lands. This section of CEQA also applies to any consignment agreements that the Lead Agency will enter into. The way this EIR is written, the public lands could be construed to be a public subsidy of a private development without popular vote.

Including the UPVA in the project scope leads to other misleading conclusions in regart to altenatives. On p. 7-46 it is concluded the Park Enhancement Alternative meets only the public recreational and trails objectives of the project. Yet it leaves out: the possibility of a successful, financially feasible coastal resort hotel, provide long term protection and enhancement of CSS, consistency with the NCCP, improve water quality, etc.

The Park Enhancement Plan does not preclude the developer from building the hotel and golf course as he is presently entitled to do. There is nothing in this DEIR that shows he could not do so. In the case of Citizens of Goleta Valley v. Board of Supervisors (2nd. Dist.1988) a finding of unfeasibility must be supported by "substantial evidence", such evidence must be specific and concrete. The case involved a proposed coastal hotel and the Court refused to accept assertions that a particular alternative was economically infeasible simply because it might be less profitable to the developer. "In the absence of comparative data and analysis, no meaningful conclusions regarding the feasibility of the alternative could have been reached."

There is not enough comparative data or analysis in this DEIR to determine whether the Park Enhancement Alternative, or any alternative, is infeasible. Nor can anyone assess the merits of the hotel on its own without use of public lands.

### **ACCUMULATIVE IMPACTS**

Since those Long Point entitlements have been granted, a full 18 hole golf course is now under development in Rolling Hills Estates. The Lead Agency must use reasonable efforts to disclose and discuss related future projects even if under review by other agencies. This EIR must consider this proposal by Meritage Rolling Hills Golf to prepare a design for the Palos Verdes Landfill in Rolling Hills Estates into an full 18 hole golf course. The fees are proposed to range from \$50 weekdays and \$65 weekends.

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This golf proposal in RHE should be included in table 4-1 on p. 4-3. It is more likely to become a reality than #4 "Point View" or #5 "dryfarming on Upper Fillorum" and is more likely to have accumulative impacts that interact with the Project. Both #4 and #5 have been identified in this DEIR as "infeasible". The golf proposal in RHE is feasible.

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The original Destination Hotel entitlement is also missing from table 4-1. If this project were not approved, this hotel and 9 holes of golf could still be built and remains a viable future project.

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Section 5.3-5 (p.5.3-63) states the LPHCP mitigations will result in less than significant accumulative impact to biological resources. As discussed under LPHCP in this letter, there is not enough detail in that LPHCP to arrive at this conclusion.

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### **NCCP AND THE LONG POINT PROPOSAL**

The DEIR on p. 5.3-43 states that the golf plan on UPVA is "consistent with the City's NCCP". For the following reasons, this conclusion is false.

The resource agencies have repeatedly commented that the golf plan on the city hall property creates NCCP planning problems with its fragmentation of habitat. Biologists and botanists have added their concern with the grading, revegetation plan and chemicals needed for golf greens. The CSS habitat on UPVA is within 'Unit 8' of lands designated by USFWS as being critical habitat for the gnatcatcher. UPVA provides a core linkage with other areas for the gnatcatcher.

Currently, the NCCP is not final; only alternatives have been suggested. Whether or not the UPVA will be in the reserve design has not been determined yet. If anything, based on the Resource Agency's comments, UPVA may very well be included in the reserve design which would exclude part or all of the golf plan under this DEIR.

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The developers have been pushing for golf while the Resources Agencies, biologists and botanists are trying to design a long term, functional habitat plan under the guidelines of the NCCP. This battle over the ultimate plan for UPVA has led to a stalemate of the NCCP reserve design. As we all wait for this issue to be resolved, this community may lose the opportunity to secure funding to acquire open space. This impact to the NCCP has not been addressed in this DEIR.

The statement on p.5.3-43 is inconsistent with the statement on P.5.3-62 which says, since there is no NCCP or HCP, this project will have no impact to these plans. On one hand the DEIR says it is consistent with the NCCP then turns around and says that there is no impact because the NCCP has not been adopted. This inconsistency is a direct result of not addressing that the NCCP reserve design for UPVA has not been determined yet, and that this project is one of the major stumbling blocks to that design and consequently the NCCP adoption. This issue must be addressed in the EIR.

On p. 5.3-46 the issue is raised of how a resource fits into a regional context and how a project might conflict with State or Federal



resource conservation plans. The issues of fragmentation, quality of habitat and grading activities by this project do not fit into their concept of proper conservation plan. They have designated the UPVA as a critical habitat area for the Fed. Threatened Ca. Coastal Gnatcatcher and defined the UPVA habitat as a crucial link to other regional habitat areas for this species. The conclusion that the project has no significant impacts in this capacity are not substantiated in this DEIR.

Exhibit 3-10 is the phasing timeline. All of the grading (sec.1.4) is during the first and second quarter of 2002. This is right in the prime breeding season of the gnatcatcher and is not consistent with any HCP let alone the NCCP. This oversight is repeated in mitigation 5.3-1d on p. 5.3-66. Mitigation section 5.3-1e is also not consistent with the phasing timeline.

On p. 5.3-38 it is stated that there is no remaining acres of CSS in the City NCCP that can be removed under the 4(d) special rule. Exhibit map 5.3-4 and p. 5.3-42 describe 4.91 acres of habitat take. This take is inconsistent with the NCCP.

P.5.3-63 states that the project is consistent with the preferred reserve design. This statement is incorrect as the current preferred reserve design is in the process of being redesigned.

#### **EIS UNDER THE NEPA**

Because the NCCP has not been completed, and no future 4(d) permits will be available in the foreseeable future, the DEIR states on p.5.3-43 "mitigation/compensation for the loss of coastal sage scrub and gnatcatchers would need to be coordinated with the USFWS and another federal responsible agency involved in the Project through Sec. 7 of the FESA or with the USFW through Section 10 of the FESA."

Section 15220 of CEQA states that projects that are approved in whole or part by federal agencies requires an Environmental Impact Statement under the National Environmental Policy Act. This is in addition to the CEQA requirements.

For these reasons, the EIR must be accompanied by a EIS under NEPA.

#### **L.A. COUNTY SEA**

The L.A. County has a program of identifying Significant Ecological Areas (SEA). Within that mapping system the Palos Verdes Peninsula is included as areas #27, #31 and #32.. The Planning Dept. of RPV has been in contact with George Malone of the L.A. Co. Dept. of Regional Planning who is in charge of these SEAs and the City of RPV has been told that the these original areas #27, #32 and #32 are being retained as originally approved.

The DEIR has not addressed impacts to this important L.A. Co. land use designation.

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## **QUANTITY VS QUALITY**

### **HABITAT**

The DEIR states that the project increases the quantity of habitat. But when one looks at the DEIR tables showing a net increase of habitat, one must keep in mind that quantity has little to do with *quality* of habitat.

The "new" habitat will not function as well as large, contiguous areas of habitat, such as found in the Park Enhancement Plan. Scraping and moonscaping existing vegetation then re-planting habitat takes years for the microbiology of that ecosystem to re-establish. Removal of microbes from the soil can effect plants which effects insects which effect small animals which effect raptors, etc. all of the way up the food chain. A slow, careful restoration of existing habitats with the Park Enhancement Plan has far less impact to the ecosystem.

Fragmentation, edge effects, grading, golf green chemicals and a slurry of human impacts with golf activities could push the threatened gnatcatcher over the brink of extirpation from the site entirely. All of this with the project tables showing a "net increase in habitat". I ask what quality of habitat.

And on p.5.3-42 it is concluded the LPHCP will enhance existing degraded habitat to obtain "significantly improved habitat values". This EIR must analyze the above concerns before coming to this conclusion.

I see no where in the DEIR that this issue of quantity vs. quality of habitat is fully addressed. The Park Enhancement Alternative would eliminate all of these impacts, yet it is not analyzed.

Section 5.10-4a does not specify what chemicals will be used in the Fire Ant Management program and what effect those chemicals will have on native plants and wildlife.

### **PARKS AND OTHER "IMPROVEMENTS"**

In addition to the increased habitat, the additional trails and parks created by this project sounds equally impressive. Until one looks at the quality of those "improvements".

In exchange for the many acres of parkland on the UPVA, the public receives back, after golf development and maintenance yard relocation, 3 new parks. One .2 acre or 817 sq.ft., another 1.6 acres, and another 1.0 acres for a grand total of 2.8 acres of park in exchange for large amount of existing parkland.

Of the 11.1 miles of new trails, most of them on the UPVA are routed along major vehicular corridors or around parking lots and City Hall. The only section that does not follow this cemented path is a very steep incline along the eastern edge of UPVA. Quality vs. quantity.

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## **GRADING AND BIOLOGICAL RESOURCES**

Exhibit 5.3-4 labeled "Biological Resources" has a dotted line throughout the UPVA. This indicates the areas that will be graded yet there is no reference in the legend nor in the text to this fact. This should be corrected.

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There must be a full analysis of the effects of grading will have on biological resources including the LPHCP. 139,000 cy of grading is proposed. At 8 cy per truckload, that translates to over 17,000 truckloads. The construction phasing schedule Exhibit 3-10 shows all grading to take place between the first and second quarter of 2002, Assuming 1/2, or 6 weeks, of that will be devoted to UPVA, that translates to approx. 2,800 truckloads on UPVA per week, or 579 truckloads per day on a 5 day week.

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All of this grading will occur during spring time, or prime breeding season for the gnatcatcher. There is no analysis of the impact this intense grading activity during Gnatcatcher breeding season will have on this threatened species or other species.

Other inconsistencies were discovered when viewing the "new and improved" project plan behind the desk at City Hall. For instance, the new plan has a winding golf cart path transversing through a large section of the Artimesia Dominated CSS between golf hole #4 and #2. This golf path is nowhere to be found in the biological map 5.3-4 of the DEIR. If this "new" plan is being submitted, then all biological resource impacts are inaccurate.

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Mitigation 5.3-2c requires fencing be installed along the edge of conservation, restoration, and enhancement areas. I see no where in this DIER an analysis of the impact of this fencing to biological resources.

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I see no criteria established for how the "100 foot" buffer area between grading activities and gnatcatcher nests was determined.

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### **LPHCP**

The Long Point Habitat Conservation Plan mentioned on p. 5.3-42 of the DEIR states that the details of the LPHCP can be found at City Hall. Once one makes the drive to the Planning Dept. and pursues the document, the LPHCP has surprising little information to analyze the habitat plan.

No detail of:

- drainage plan for UPVA, including an assessment for chemical runoff of revegetation/restoration plans and how that interacts with ongoing introduction of chemicals with golf activities
- what chemicals will be used for golf (which form of: rodenticides? pesticides? herbicides? fertilizers? Will organophosphates such as chlorpyrifos in Lorsban or Dursban be used?), what form (granules? liquid?), what drainage patterns will those golf chemicals follow on the UPVA and how those chemicals will interact with the native environment. This is especially important as it is stated on p.5.6-33 that

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all of the drainage from Discharge Point 2 on the UPVA would be" conveyed overland either across the golf course or through swales" mimicking natural drainage patterns. No recapture ponds are being proposed for Discharge Point 2 in the sensitive habitat of UPVA and no analysis of how sensitive species will be affected by the chemicals that would be around their activities on or around golf greens or vegetation swales.

- restoration plans including what method of revegetation and/or restoration (hydroseeding? Seed implanting with mycorrhizal fungi inoculum?, what seed mix?, planting techniques? Which areas will get which technique?),
- irrigation schedules,
- mapping of impacted areas for grading,
- habitat goals and limitations with time lapse, cost estimating and financing,
- target functions and performance standards,
- implementation of the HCP including rationale for expected success,
- immediate and long term maintenance and monitoring program including data collection method, qualitative and quantitative vegetation and species survey methods, contingency measures and record keeping.

In reference to section 5.3-3 on p. 5.3-62, the LPHCP does not have enough detail in the plan to assess impacts to wildlife movement. And this section does not address fragmentation of habitat with increased edge effects.

There is not enough detail and analysis in the LPHCP to determine if cumulative impacts to CSS will be less than significant. (p.5.3-63 section 5.3-5)

### **WATER QUALITY**

The conceptual drainage system schematic for discharge pt.1 & 2 listed as exhibits 5.6-4 and 5.6-5 on pgs. 5.6-28 and 5.6-29 are blank.

The "state-of-the-art" pollution control measures mentioned on p. 5.6-27 are not spelled out and do not differentiate as to which areas it will apply.

P. 5.8-28 is a claim that the WQMP strategies and BMPs would control runoff pollutants. It goes on "On the UPVA, drainage would be conveyed overland either across the golf course or through swales."

I don't understand how, with the cornucopia of chemicals associated with golf usage, combined with the tremendous amounts of water required by golf acting as a medium to freely distribute those chemicals and alter salinity levels, this would not have an impact on the sensitive habitat planned so close to this toxic soup trickling about. How can this possibly be an considered an adequate plan of mitigation without this analysis? (Please refer to my comments under *Chemical Dependency-Terrestrial Habitat* in the Scoping Meeting letter dated August 22, 2000 found in the Appendix to this DEIR).

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The biofiltration of runoff mentioned as a part of that mitigation strategy could include sensitive plant and animal species and must also be addressed.

P.5.6-31 Grass clippings would be "spread along the course or wooded areas". What wooded areas? Does this really mean the Ecotones? Native habitat? What will be the chemical residue on these clippings and how will the UPVA drainage plan mentioned on p. 5.6-33 and p. 5.8-28 distribute any identified chemicals from those clippings? What will be the accumulative effect on native habitat and wildlife?

Unless the BMPs specify periodic flushing and capture of chemicals in the "dry detention basin" described on p. 5.6-41, it will do nothing more than concentrate chemicals in the dry season only to be flushed out in high concentration in the rainy season.

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### **BMPs**

The mention of Best Management Practices as mitigation in this DEIR is not enough to analyze impacts to water quality or biological resources. A specific plan for all mitigations must spell out details of that mitigation in order to fully analyze whether impacts would, or even could, be mitigated to less than significant.

The Supreme Court has emphasized that an "an EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." Most of the mitigation measures are nebulous and fail this test. This includes the LPHCP.

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### **EMERGENCY RESPONSE**

No where in this analysis does it analyze if response time for emergencies because of increased traffic will push emergency response time over a critical threshold. That extra few minutes more it takes for an paramedic to transport a patient to a hospital after this project is built could cost a life.

On p. 5.10-31 it is concluded that the project will not have a significant impact to emergency response. On pg. 5.11-12 the removal of this heliopad is considered a significant impact unless mitigated. Mitigation is merely that the applicant "consult with the LA Consolidated Fire Dept". Consultation is not enough. The heliopad will have to be replaced somewhere else and that location should be identified to assess if it would have additional impacts that need to be analyzed.

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P. 5.11-22 mitigations for fire protection is to be worked out in the future. Details should be discussed and mitigated in the EIR.

What is the impact to emergency response time for the fire dept. and/or rescue teams with the loss of the heliopad on the UPVA?

## **GOLF SAFETY**

P. 5.10-34 discusses golf safety. First, hole #3 runs very close to a cart pathway and a pedestrian walkway. Exhibit 3-8 on p. 3-26 shows some detail of a portion of this high risk. The DEIR must address pedestrian safety in relation to this golf corridor.

Hole #5 drives right into a pedestrian trail and it doesn't seem as though hedges will be adequate mitigation.

Hole #2 runs very close to P.V.Dr.South and impacts to traffic must be addressed.

Even though in the eyes of the law a person playing golf assumes the risk on a golf course, this does not apply to someone who is merely a pedestrian in the vicinity. It is certain that some balls, as hard as rocks, are going to be struck poorly and this risk to the general public must be addressed in the DEIR. Financial impact of liability insurance must be discussed as well.

## **LIABILITY WITH GOLF**

Aside from the injury liability issue, there is a financial liability that the City and the public must have assessed; the possibility of financial burdens should this project fail under its consignment agreement to use the UPVA.

From L.A. Times Business Section article dated March 20, 1999 entitled "Golf Developers Follow Risky Course".

With the phenomenal growth of the sport projected to level off during the next decade, many are beginning to wonder if the Southern California building industry is heading down the wrong path.

"I'm not an economist, but I worry about it", said Ted Robinson Sr. , a nationally known golf architect based in Laguna Niguel. "I think we are getting too many courses in the high-end category. I've talked to a lot of people who just don't want to lay these expensive courses."

Greg Currens , vice president of Newport Beach's AMHC Corp., which built Aliso Viejo Golf Club said "A regulation-length layout requires about 140 acres, and golf courses are rarely the most lucrative use for land. There has to be something wrong with the property to put a golf course on it. Something that makes it unavailable for housing or commercial development."

The first quote from Ted Robinson should raise some red flags on whether or not high end golf has a viable future. It seems like there is a

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tremendous liability the City could be undertaking if they were to allow this exclusive high end golf land use on City Hall property.

This last quote should answer that question of: why does this developer want to displace 5 holes of golf off of his property and onto public property? Answer: there is more profit in residential use on the Long Point site than golf. This raises the CEQA questions of disclosure discussed above under *Misleading Scope of the DEIR*.

The City should be aware that, by the developer displacing golf off of his property and onto the City Hall property, he is displacing this liability to the citizens of RPV in exchange for a more reliable and profitable addition of casitas on his own property. He is also displacing all of the ongoing maintenance costs and, with the default of the consignment agreement, could become a fiscal burden on the City.

The DEIR must analyze this liability and its potential financial impact.

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#### **TRAFFIC**

On p. 5.12-5 I don't know why 9th St. or 25th St. was analyzed in the study area as an artery between Western and Gaffey in San Pedro. Everyone I know uses 1st St. to connect between these two streets, especially for access to the 110 frwy. entrance. Cars pile up waiting to enter onto Gaffey at the 1st. St. signal both mornings and evenings. The same is true for exiting the 110 frwy. Many people heading for P.V. Dr. South turn onto 1st St. up the hill to Western to avoid the traffic signals on Gaffey. This oversight continues throughout the analysis including mitigation measures described on p.5.12-46 and must be corrected.

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#### **NIKE MISSILE SITE**

Public Resource Code section 21084 prohibits the use of categorical exemptions for a project that may cause substantial adverse change in the significance of certain historical resources. The DEIR must address how the proposal to bury the historic Nike Missile silos complies with this section of the Public Resource Code.

Public Resource code section 21084.1 states that a project that "may cause a substantial adverse change in the significance of an historical resource" is "a project that may have a significant effect on the environment." A mandatory finding of significant impact includes the elimination of important examples of California history.

Section 5.4 discusses the historical significance of the Nike Air Defense site and Battery 240. Option 2 with mitigation 5.4-1c and 5.4-1e, on p. 5.4-24.25 should be eliminated until an assessment by military historians can determine if documentation alone is adequate to preserve these historical sites. That analysis is included in the EIR.

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## **RPV GENERAL PLAN**

On p. 5.7-27 it is concluded that the Project will have less than significant impact to the RPV General Plan (GP) if amended from Passive Recreational to Active Recreational. There is incorrect or incomplete analysis in this project consistency with the GP.

CEQA states that general plan amendments frequently can culminate in significant environmental effects, particularly where they will allow specific areas to be developed for previously disallowed land uses. CEQA guidelines specify that if a project is inconsistent with a general plan, the impacts should be considered significant.

The follow are inconsistencies with the GP.

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### **Landslides**

P.5.7-9 of the DEIR summarizes GP Resource Management District 5 as "Movement in certain areas could be again triggered and much of the area not be suitable for most development and uses."

CEQA Guidelines section 15126 sub.(a) addresses safety problems caused by a project and states "the EIR shall analyze any significant environmental effects the project might cause by bringing development and people into the area affected.."

On p. 5.7-37 with the GP consistency analysis under policy #3,#4 and #5 there is no Geotechnical analysis to identify the relation of grading and addition of water for golf greens to the area identified as "Qls(?)" or "possible landslide" in Exhibit 5.5-2. This is the same area where golf hole 6, the maintenance yard and an underground pedestrian/golf cart tunnel and public pathways is proposed.

Landslides are caused by two types of forces; external and internal. External causes of landslides are when the driving forces exceed the resistive forces. Areas where these two forces have been in equilibrium for millennia can be thrown out of balance with grading activities. I see no where in this DEIR an analysis of the redistribution of earth with grading activities in this Qls(?) area and what effect it might have on creating an landslide.

Internal forces have to do with failure within the various soils. The greatest catalyst for slope failure is water. As water infiltrates the soil, it reduces the soil's cohesion by increasing the pressure (hydrostatic pressure) between particles and dissolving binding materials and cement, all of which reduces its strength (shear resistance).

Golf greens require an enormous amount of constant watering. This perpetual irrigation can create hydrostatic pressure and compromise shear resistance enough to cause a landslide in this Ql(?) area. Human activities in this area identified in this DEIR poses a risk that must be assessed. The DEIR discussion on p. 5.5-26 concurs with this conclusion.

If one looks at Exhibit 5.11-2 we can see that there is a proposed addition of a water line directly above this area. The possibility of a pressurized irrigation line failure, which could occur at times with no one present, must be addressed in this area that has been identified as

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"possible landslide". What if there is a slow, undetected leak? What is the effect of this water on expansive soils?

The DEIR must address this impact, and if mitigations are proposed, they must be specific enough to analyze. In addition to calculating the effects of water infused into this area, soil analysis must be done. I see no exploratory borings anywhere near this area.

The cacti farm currently in this area is dry farming and should not be used as a comparison for this golf greens geo-hydro analysis.

This potential landslide issue must not only be addressed in detail for the project, but for areas outside the project boundaries. The Qls identified in Exhibit 5.5-2 appears to extend beyond the project boundaries to the east, specifically the Salvation Army property. One can see the bowl from an historic landslide and it straddles this eastward project boundary. This geologic impact study must take into consideration this eastward property which is outside of the project description and the effect it might have on the housing located in this area.

Any mitigation as discussed in Section 5.5 "Landslides" (p.5.5-30,31) must include the above described parameters.

Also this DEIR must address Public Resource Code section 21095 which requires assurance that the significant environmental effects of agricultural land conversion are quantitatively and consistently considered in the environmental review process.

### **Exclusive land use with golf**

The Project proposes to amend the GP from "passive" to "active" to fulfill its objectives of placing golf on most of the UPVA. The DEIR has not analyzed this fundamental land use change and its impact to the community.

The financial analysis put forth by Economic Research Associates for the developer in July 2000 clearly indicates that the high end golf proposed for the UPVA is exclusive land use. On p.10 it is stated that the primary market for this golf plan is "relatively affluent" showing the income of golfers as more than 40% higher than L.A. Co. medium income.

On p. 14 the report states that 11-12% of the general population play golf. Then on p. 16 it states that, of that 11-12% who play golf, only 10-20% play high end golf such as is proposed on UPVA. This means that most of the park will be taken away from 98-99% of the community for exclusive use by that 1- 2% of the general population that play high-end golf. In addition, the analysis specifically excludes all children under 12 further advancing the idea of golf as exclusive land use.

Yet this golf plan is concluded to have "less than significant impact" to the general plan or the Federal deed restrictions.

CEQA guidelines state that a draft EIR must analyze the extent to which the proposed project's primary and secondary effects will commit nonrenewable resources to uses that future generations will probably be unable to reverse. Just as an highway may give access to a previously

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inaccessible area, the exclusive use of golf on UPVA will exclude use by a major portion of the general public and most certainly children under 12 years of age. These impacts must be analyzed in this EIR.

Section 15131 of CEQA states that social effects of a project shall be treated as significant effects on the environment.

A fundamental question arises in the land use change proposed with this project: Should the opportunity for the public to fully restore habitat in this parkland, enhance trails throughout the park, create other sport activities that include children under 12 such as soccer or baseball, preserve the biological and cultural heritage and provide educational opportunities for their children, help further the NCCP to help acquire other open spaces, in the interest of 100% of the community, be preempted by a developer who wants to further his own development by placing a restricted use of this parkland?

This significant impact of changing the General Plan land usage on UPVA must be addressed in the EIR.

Under the section of the General Plan entitled "Parks and Recreation" Section A reads "A SIGNIFICANT ASPECTS OF RECREATION IN OUR COMMUNITY IS THE OPEN SPACE WHICH REMAINS WITHIN THE CITY. WHETHER USED FOR FREE CREATIVE PLAY AND LEARNING EXPERIENCES BY OUR CHILDREN OR FOR ITS AESTHETIC BEAUTY, AS MUCH LAND AS POSSIBLE SHOULD BE KEPT FREE FROM EARTH MOVING OR BUILDING." The EIR must address the project's impact to this aspect of the General Plan.

#### **Program of Utilization**

The project does not comply with the "general public use" criteria within the deed restrictions referred to on p. 5.7-23. Refer to the discussion above on "*Exclusive Land Use with Golf*".

The concession agreement criteria has not been met as no "prior concurrence" has occurred in writing from the Dept. of Interior.

#### **LAND USE AND RELEVANT PLANNING POLICIES**

On p.5.7-5 hiking trails are not included in the list of Point Vicente Park amenities.

#### **TRAILS AND SCENIC VISTAS**

The Conceptual Trails Plan for RPV specifically states on. 5.13-10 that "all trails should be available to the maximum number of residents". The discussion that ensues with this section as it relates to the UPVA describes a series of trails that has nothing to do with what exists on the property today.

The DEIR does not adequately address existing trails on the UPVA that run along the bluff edge. It is only by properly describing the existing conditions that one can see how the golf plan will have significant impact on the scenic vistas on UPVA. In reference to my

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comments and map *RPV Specific Coastal Plan* in the DIER Appendix, one can see that the golf plan excludes access to most bluff scenic vistas in the UPVA from the general non-golfing public. This renders inaccurate conclusions in Sec 5.1-3 and 5.1-4.

The Park Enhancement Alternative describes these trails, proposes to enhance them and provides handicapped access to these trails and the scenic bluff edge. The project does not provide any of this.

The DEIR must also separate out the bike and pedestrian trail mapping to determine safety issues.

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### **"NO PROJECT" ALTERNATIVE**

The "no project" alternative is incorrect when it concludes none of the improvements proposed would occur under this alternative.

What is not stated in 7.1, p.7-3, is that the "no project" alternative includes the existing entitlements which is full development of the Long Point site with the hotel and a nine hole golf course in the RHA. This oversight must be corrected as CEQA guideline section 15126 specifically states "the 'no project' alternative analysis should discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved.". A full description of the existing entitlements is listed on p. 5.7-5, 6 & 7 under "Relevant Planning Policies" and these entitlements are still viable and they could occur in the foreseeable future

In addition, the courts have ruled in *Dusek v. Anaheim Redevelopment Agency* (4th Dist. 1986) that a proper "no project" alternative must look at *both* existing conditions *and* a future build-out scenario which would likely occur on-site if a proposed project application is denied. It makes the distinction between a "no project" and a "no development" alternative.

The DEIR must either have as an additional alternative analyzing development of the Long Point site with its existing entitlements or include that analysis under the "no project" alternative. It must be listed in the Accumulative Analysis section as well.

The DEIR should have a full analysis of this "Existing Entitlement" alternative including economic analysis. The developers are sophisticated investors who purchased the Long Point site with a well thought out RTC bid based upon its existing entitlements. Since that purchase, surrounding amenities that are additional benefits to the hotel have been put into place including a world class golf course at Ocean Trails just a 5 minute shuttle ride away.

On p.4 of a market analysis prepared In July 2000 for Destination Development Corp. it says the Ocean Trails golf course provides "a suitable recreational infrastructure, formal or informal, for the Long Point guests". This study with important information has not been included in this DEIR.

P. 5.12-40 note 2 of the DEIR states "While the Hotel Coronado does not include golf on site, the Coronado Golf Course is located nearby, and the Hotel provides a shuttle service to this amenity." The

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Hotel Coronado is a very successful hotel and this shuttle arrangement is precisely what Ocean Trails has to offer to Long Point Project. This must be included in the analysis for the EIR.

This full analysis of existing entitlements is necessary to carry out a full assessment of this project.

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### **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Sec.7.10 p. 7-46 concludes that the "No Resort Villas-Option B" is the environmentally superior alternative. This conclusion severely diminishes the creditability of this DEIR. How can the Option B alternative be environmentally superior to the "Point Vicente Park Enhancement Alternative"?

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### **UPPER POINT VICENTE PARK ALTERNATIVE**

If one looks at Exhibit 5.7-1 the UPVP alternative follows the land use designations of Institutional Public and Passive Recreational. It also follows the existing land use that is currently on the property. The UPVP has no impact to these land use designations in contrast to the golf plan which will radically alter all of the Passive Recreational land use designations.

The Park Enhancement Plan Alternative would benefit the Long Point development. Not only will they save the millions of dollars it costs to build and maintain a golf course, they would be freed from the restoration costs. And all of the hotel residents would be welcome to enjoy the fully restored parkland, not just golfers.

This DEIR does not address the fact that, for the entitlement of one developer's idea of a project, these public lands are being forever stripped of its fully restorable potential and the numerous biological, educational and cultural benefits it has to offer to this community. That is one colossal impact.

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The DEIR could address this issue under the Park Enhancement Alternative as the project does provide all of the public benefits and habitat protection mentioned above.

The hotel does not have to be attached to these parklands. Both a nice hotel can be built on their own site and a Park Enhancement Plan can be implemented on the city hall property. This must be made clear on the Park Enhancement Alternative and the "no project" alternative.

The Park Enhancement Plan Alternative of this DEIR would be following the vision set forth 26 years ago in this city's general plan, complying with the Dept. of Interior's deed restriction, leaving this City Hall land open for all to enjoy while preserving threatened wildlife.

This no impact analysis is missing in the DEIR.

### **Park Enhancement vs. Golf Comparison**

P.5.13-20 says the project proposes the development of 5.0 acres of parkland, 5.2 acres of trails and a 71 acres golf course all resulting in a net increase of 71 acres of recreational facilities for the City. It goes on with section 5.13-3 to say that .9 miles of new general public trails/stairways and 3.2 miles of golf cart paths for use by the general public during non-golfing hours.

A qualification is needed for these statements.

1) For the UPVA, almost all of the trails of the project are either along major vehicle arteries or circling the city hall along parking lots. On p. 5.13-27 we see the project's description of an "urban trail" as running along Hawthorne Blvd. The Park Enhancement Alternative in contrast has far more acres of high quality, passive trails in the UPVA. This same superior design over the project description applies to the analysis on P.5.13-30 under "Parks Master Plan".

2) The net increase in recreation for the project is all golf. The Park Enhancement Alternative has reserved the upper flat areas for future input to accommodate a variety of recreational activity designs that could serve a much broader spectrum of the general population of all ages. The remainder of the Park Enhancement plan is designated for passive recreation, which has far more acreage than the golf plan on UPVA.

3) What is not described with respect to public use of golf cart paths in section 5.13-3 is they will be reserved exclusively for golf use dawn to dusk. This means the general public could only use them in during the night with no lights. The Park Enhancement Alternative would be available to the general public at any time of the day.

For the reasons above, the conclusion arrived on p. 5.13-25 that the project will increase public access on UPVA is inaccurate. This is a direct result of not including existing trails in the analysis and not analyzing exclusive golf use as it affects public accessibility on UPVA.

The Park Enhancement Alternative would have far fewer cumulative effects than the project impacts as described on p.5.13-33.

On p. 5.13-29 it is concluded that the location of the maintenance yard on an existing athletic field will have no conflict with this recommended use because "this field has never been utilized". The fact that this recommended use is not utilized should not change the status of this land use designation. Either this illogical analysis should be corrected or, to be consistent, it should apply to all other aspects of this project including placing a public park on RHA because it has not be "utilized" as a hotel.

On p. 6-1 is the discussion of short and long term impacts. By not taking into consideration important issues, in this comment letter, far reaching conclusions are derived such as on p6-2 with the statement "new conserved habitat areas that would expand and preserve in perpetuity areas of native vegetation".

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As with the project description under Section 6.0, the Park Enhancement Alternative should have a list of benefits to the community. That list should include:

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☞-Once the native plants are established, the habitat will not require any water use and is more in line with sensible water conservation plans.

☞-The Park would be open to 100% of the general population, regardless of income level, and would be in full compliance with the Dept. of Interior's "general public use" deed requirement.

☞-. The Park Enhancement concept does not require any general plan change as it is exactly the use that originally was intended for this land. The Park Enhancement Alternative design does not have any active recreational uses in its design except those that are currently being used under the Institutional zoning areas. Its design, however, leaves open active recreational use designations that could be addressed as a future project with input from the public and City agencies.

☞-The beautiful vistas along the edges of the bluffs overlooking the Lighthouse and Catalina would be preserved for the general public, including some handicapped access points.

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☞-Parks and open spaces provide the largest educational setting outside of schools. The restoration of the park habitat provides tremendous educational opportunities and provides a living classroom for our children. There could be an "adopt an acre" program whereby a class, or scout group, would be responsible for restoration of a specific area.

The students could follow the restoration from start to finish, keeping track of its progress including a historical records of plant, bird and insect counts. Restoration projects can tie into the curriculum of the student's school and offer a unique sense of connection with the world around them not offered in traditional textbooks.

☞- Nike missile silos would be saved adding to the historical preservation of the UPVA.

☞-This concept does not require any use of fertilizer, pesticides, herbicides or rodenticides any one of which could spell disaster to terrestrial or marine habitat.

☞-There is no disruptive grading or fragmentation of the habitat. In fact this Park enhancement would preserve the habitat in a sound, contiguous plan reinforcing Gnatcatcher and Cactus Wren survival rates. It also helps establish core linkages to other habitat areas increasing the benefits to the threatened species surviving in the area. Restoration would be conducted slowly and carefully without the massive disruption of grading and other impacts of the project.

☞- Since the Park Enhancement Alternative is precisely what biologists, botanists, and Resource agencies have set forth as principles of good habitat planning, this alternative would help advance the NCCP approval process.

☞-And, the sooner an NCCP is finalized, the better chance we have of obtaining funding to set aside other areas as natural open space, such as the Portuguese Bend Preserve. And, by the city implementing a habitat restoration plan such as this, the City's credibility with funding agencies to obtain the funds would be advanced even further.

☞-In addition to restoration of coastal sage scrub and southern cactus scrub for the gnatcatcher and cactus wren, native habitat could be restored for the reintroduction of the endangered Palos Verdes Blue Butterfly.

There are many volunteer groups in the south bay that could help with this restoration including Audubon Yes, or Youth Environmental Services some members of which include P.V. High School students, Rhapsody in Green, who are responsible for restoring the Blue Butterfly habitat in San Pedro, and the P.V.P. Land Conservancy, which has an excellent track record of restoration projects. All of the above mentioned groups have expressed their willingness to help with the restoration and, again, provides a wonderful opportunity for children to learn.

☞-The Park Enhancement plan is flexible enough to add to the recreational and historic component of the general plan including;

- a wide variety of recreational activities on the upper flat section of the UPVA

- a museum that could house detailed habitat descriptions and display settings for people to get a closer look at the natural environment they will encounter on the trails.

- Native American Indian setting could display in detail how they lived and how they prepared their foods from the native plants.

Combined with this display could be scheduling of periodic lecture/demonstrations by Native Americans detailing the indigenous life years ago, including food preparations, stories and traditional songs and dances.

These are only a few of the park enhancements possible that could serve to heighten the enjoyment of this area for the entire community.

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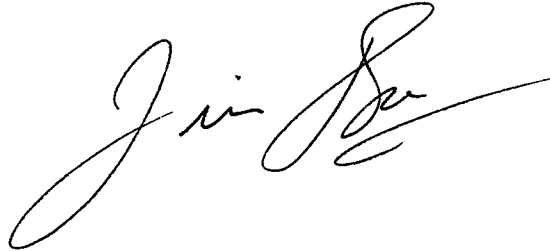
And any display could be designed to complement and work in symmetry the new Palos Verdes Interpretive Center.

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With each category of impacts listed with this project, this alternative is superior.

The only exception is that it does not meet the objectives of this project. As discussed with the scope comments at the beginning of this letter, this conclusion is only reached because the project has, by its own definition, set its own objectives of golf on the UPVA. It has nothing to do with not meeting the objectives of building a hotel with full entitlements on RHA as specified in this DEIR.

136NN

A handwritten signature in cursive script, appearing to read "Jim De".



MAR. -27' 01 (TUE) 15:45 A WAY TO MOVE INC

TEL:310 781 3073

CC +  
Dane Snow

RECEIVED

1420 V

MAR 28 2001

Palos Verdes Estates

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Ca 90276

March 27 2001

Mayor Lyon,  
Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorn Blvd  
Rancho Palos Verdes, Ca 90275

Dear Mayor Lyon, and the City Council,

## THE LONGPOINT RESORT

I am writing to you about the potential of locating a softball complex on the new Longpoint resort property. As a resident of Palos Verdes having now lived in three of the cities of Palos Verdes and as a father of three daughters that have or are active Softballers I ask you to support this excellent idea.

Palos Verdes needs more activities for our young people sports are an excellent outlet for the energy of youth. Thus I would much prefer to see more effort focused on the gardens to follow us rather than another driving range. Undoubtedly I cannot attend your next hearing but please accept my letter as an indication of the strong support that I believe is abounding.

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MAR. -27' 01(TUE) 15:45 A WAY TO MOVE INC

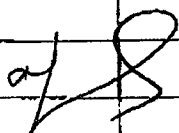
TEL:310 781 3073

P.002

put forward by PVP G Sh.

I hope you will support the Longpoint  
development and allow a new venue for the  
youth of our city.

Yours sincerely



Alex Knowles

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## PUBLIC COMMENT FORM

COMMENT NO. 138

APR 03 2001

PROJECT NAME: Long point Resort Project PLANNING, BUILDING,  
& CODE ENFORCEMENT

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Mahbooba S. Kohgadari / Walid Kohgadari - Omar Farli  
30943 VIA RIVERA, RPV, CA 90275Telephone Number: (310) 541 3117

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

- \* STOP BUILDING GOLFCOURSE NEXT TO VILLA CAPRI
- \* STOP / DOWN SIZE LONG POINT.

Negatives:① Traffic Congestion.② Pollution -③ More accidents : Via Rivera & Hawthorn④ Golf balls could hit cars & people⑤ Distraction natural beauty that is unique for RPV which is worldwide known.⑥ Disgrace to future generations that we allowed money greed take over our lives⑦ Major commercial projects like this hotel creates major safety issues: more waste, utilizes more water & electricity, Gas⑧ Obstruct the unique ocean views that everyone has enjoyed so far.Conclusion: Stop the project Long Point & Golf course

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M. S. Kohgadari  
Omar Farli

MAR 28 2001

COMMENT NO. 139

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawathorne Blvd.  
Rancho Palos Verdes, CA 90275

27 March 2001

RECEIVED

MAR 30 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mayor, Members of the City Council and  
Planning Commissioners:

I am a resident of Rancho Palos Verdes and am very interested in seeing the Long Point Resort project proceed to completion as soon as possible. I think the development would end up being a great asset to our community and put the currently under utilized property to use for the benefit a vast majority of our residents. My wife and I enjoy walking by the ocean and the new trails and public areas that would be available is something we would utilize. The increased tax base to the city has to be a major benefit and should be able to go a long way toward helping keep the budget balanced without future tax increases. The hotel and golf course will be a big improvement over the current status of the property.

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Again I would like you to support the Long Point Resort project.

Sincerely,

Nils Kolderup

29711 Grandpoint Lane

Rancho Palos Verdes, CA 90275

**RECEIVED**

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 9, 2001

Mayor Lyon, Members of the City Council & Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Mayor, Members of the City Council & Planning Commissioners:

We support the Long Point Resort Plan for the old Marineland site and extra City Hall land. Please help the city by supporting these plans.

140A

Ken & Mary Konopasek  
30156 Avenida Tranquila  
Rancho Palos Verdes, CA 90275

Les Evans, 02:40 PM 3/12/01 -0800, Fwd: Long Point Draft Plan

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 12 Mar 2001 14:40:14 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Draft Plan

Date: Mon, 12 Mar 2001 14:26:19 -0800  
From: J M Koplik <jmkoplik@mindspring.com>  
X-Mailer: Mozilla 4.7 [en] (Win98; I)  
X-Accept-Language: en  
To: citycouncil@rpv.com  
Subject: Long Point Draft Plan

My family, friends and I strongly disagree with the following proposed plans for Long Point:

- 1) The sale or lease of any federal lands meant for public recreation.
- 2) The building of resort casitas and villas along Palos Verdes Drive South.
- 3) Disruption of current wildlife and natural habitat areas.

Views of the Pacific Ocean along Palos Verdes Drive south should be preserved. Looking at the Ocean between homes and buildings or over high chimneys is not the same as looking at the Ocean bordered by undisturbed hills, cliffs and fields.

Walking along asphalt paths sandwiched between the sea and tract homes or between the sea and manicured golf courses is not the same as walking along a quiet trail through sage and flower filled meadows along cliff bluffs.

Once natural wildlife habitat is disturbed, there is no getting it back. Once the hotel, villas and casitas are built, traffic and pollution will increase. Noise levels and light levels will escalate. At night, fewer stars will be visible on this side of the Peninsula. With the implementation of the current Long Point plan, RPV will have lost forever its rural atmosphere and beautiful coastal views.

PLEASE DON'T ALLOW THIS TO HAPPEN !!!!!!!

Sincerely,

Doris Koplik  
32759 Seagate Drive, RPV, CA

141A

Les Evans, 03:16 PM 3/12/01 -0800, Fwd: LONG POINT DRAFT PLAN

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 12 Mar 2001 15:16:05 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: LONG POINT DRAFT PLAN

Date: Mon, 12 Mar 2001 14:44:37 -0800  
From: J M Koplik <jmkoplik@mindspring.com>  
X-Mailer: Mozilla 4.7 [en] (Win98; I)  
X-Accept-Language: en  
To: citycouncil@rpv.com  
Subject: LONG POINT DRAFT PLAN

OPPOSED TO THE CURRENT PLANS FOR LONG POINT

I am opposed to more buildings obstructing our magnificent views of the ocean and our pleasurable walks along the cliffs.

**142A**

Rancho Palos Verdes is a unique area-one of the most beautiful in the southern California area. Why destroy it? Once ruined, it is forever gone. Witness other once beautiful coastal areas that have been forever blighted by commercial and real estate development. Their views gone.

Property values here will go down here, once we destroy what is left of our beautiful coast. Years from now, do we want to say, "I remember when we could see the ocean and the cliffs as we drove along Palos Verdes Drive South. I remember when we could once walk along the coastal bluffs in the open air surrounded by natural beauty"..

**142B**

Jane M. Koplik  
32724 Coastsite Drive  
Rancho Palos Verdes

RECEIVED

MAR 30 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

30605 Rue Langlois  
Rancho Palos Verdes, CA 90275

March 29, 2001,

City of Rancho Palos Verdes  
Dept. of Planning  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275-5391

Dear Sir:

**RE: Golf Course on City Owned Property**

I want to go on record that I vehemently oppose the use of any city owned property especially that surrounding city hall for use as a golf course. I feel that the golfing community has more than sufficient local golf courses to choose from, viz, Los Verdes Golf Course, P.V. Estates Golf Course, Rolling Hills Golf Course, Ocean Trails Golf Course and the new golf course planned for the sanitation landfill in Rolling Hills Estates. Enough is enough!

Sincerely,



Joseph Kukel

143A



RECEIVED

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

MAR -9 2001

COMMENT NO. 144

copy to  
Committee

+  
Pam Snow

Benjamin Kwan

6327 TARRAGON RD

R.O.V., CA 90275

3-7-01

Dear

Mayor Lyon

Members of the City Council

Planning Commission

I am writing in support  
of the Long Point Resort

Please give the project your  
favorable response.

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Yours Truly

Benjamin Kwan

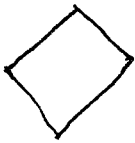
R.O.V. resident.

March 23, 01

Dear Mayor Ryan,

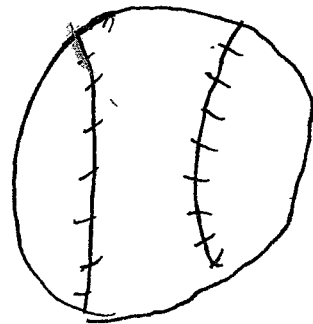
I am 12 yrs. old and I play Girls softball. We badly need new and larger softball fields. The PVP GSL would be much more enjoyable! PLEASE help us find more and larger fields to play on. Thank you for all your

help!



Sincerely,  
Kristina Lee

4765 Lone Valley Drive  
Rancho Palos Verdes, CA 90275



145A

To the Planning Commission:

Since I am going to Washington State to (hopefully) see the fields of tulips in bloom I cannot make the meeting, but I wanted you to know my thoughts on the subject of the Marineland site and the proposed golf course.

First, in a perfect world, I would plow up all the paving and cut out all the planted vegetation and let the land return to its natural state.

If the builder insists on building, I would limit his land use for a golf course by allowing him to provide the 18<sup>th</sup> hole for the golf course all ready in down the road. The hazard would be that the golfers would drive Palos Verdes Drive between the courses in their golf carts. The rest of us could enliven the hazard for them by sharing of the road!

On Saturday, March 17, the Los Angeles County came out with the news that they still want to put in a golf course on the Palos Verdes landfill. How many golf courses do we need? Palos Verdes Estates has ONE golf course.

I object to shearing off the hills to allow for the holes.

No one says they are going for a drive around West Covina, but many people like to drive around our peninsula. We have a treasure here which we ought to watch over very carefully.

I repeat, builders always and forever want land to build on. The more they get, the better they like it. Open country is NOT what they want to make a profit. But they make the profit and run off back to where they came from and we are stuck with whatever they can get away with putting up.

I don't want to look at another golf course. I do not want to play. I do not want to learn. Many people will not play at Los Verdes Course because at every hole the ball runs down-hill.

I do not like the way Ocean Trails Golf Course was put in. I do not like the burn which was thrown up so that all the natural contour of the land going down to the ocean is lost. All the driver along Palos Verdes Drive can see is the dirt bulwark and the faraway ocean. You know that you are blocked out of all the land

APR 04 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

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between you and the edge of the cliffs because they want "their golfers" privacy protected from the "average citizen."

I do feel that we have a very privileged peninsula to live on. I try my best to be aware of MY RESPONSIBILITIES to the land I occupy because I live here. Part of that means that we ought to look closely at what is offered to us in the way of additional building. Marineland was not able to financially make use of the truly gorgeous site it was PRIVILEGED to be given. What makes us SO SURE that a hotel is going to be solvent? And what happens if it is not? Another ghost town? We certainly have our share of vacant boarded up dreams.

Do we become another slopped together West Covina? I hope not. I hope we keep our unique character and our treasure which we have been lucky enough to live in.

Respectfully and hopefully,

Marlys Lindenmuth  
6104 Scotmist Dr.  
R.P.V. 377-3150 4/2/2001

146A

**The Long Point Resort***A beautiful addition to the Rancho Palos Verdes community*

☒ YES, I support the resort project, which will provide both environmental and economic benefits to the community.

☒ YES, you can list my name/organization as a supporter of the project.

☒ YES, I'd be glad to help by:

- ☐ Participating in public hearings.  
☐ Writing a letter to decision-makers.  
☐ Arranging for a presentation to my civic organization.

☐ I NEED TO KNOW MORE. Keep me informed about the project.

banquet facilities, spa facilities, and other recreational services.

The Resort will also include a golf course and practice facility, as well as 11 miles of new trails, 5 new parks and 2 new general parking facilities — all available to the public. Additionally, the Resort's habitat plan will protect natural habitat — preserving the sensitive bluff areas and conserving native plant and animal life.

The most recent milestone is the City's release of a draft Environmental Impact Report. As part of the City's review process, this important step moves us closer to bringing the project to fruition. The Report examines the impact of the project on the environment as well as other issues, including traffic, resources and conservation, the area's geology and the like. The draft Report identifies numerous positive aspects of the Long Point project and identifies measures that can offset impacts.

For over two years, our development team has been meeting with residents, community leaders and City officials to hear comments and suggestions about the proposed Resort. Many constructive ideas have been incorporated into our current plans.

Our team hopes that you will be as excited about the Long Point Resort as we are. Please take a few minutes to read our brochure and respond by filling out the enclosed post-paid card and mailing it back to us.

Should you have any questions, please feel free to call us at 310-535-9360, or visit our website at [www.longpoint.com](http://www.longpoint.com).

Thank you for your interest and consideration.

Sincerely,



Robert J. Lowe  
 Lowe Enterprises  
 Chairman and Chief Executive Officer

c/o Destination Development Corporation

11777 San Vicente Blvd. Suite 900

Los Angeles, CA 90049-5011

Name Alfred Cellier  
 Address 3362 Crownview Dr.  
Rancho Palos Verdes, Ca 90275  
 Phone \_\_\_\_\_ (day) 310 (evening) 8101

Comments

*We soundly object to further development on the peninsula and to any use of public land to enhance private profit.*

147A

Dear Mayor Lyon,

I am 12 years old and this is my 1<sup>st</sup> year playing softball. I can't believe that so many of my friends are involved with this sport. There is only one problem I can tell you about this ~~soft~~ softball league. The fields are too small and there are not enough fields that are available to play on. If you can fix or help with this problem I will be very thankful.

148A

Your Softball player,  
Angela Lukstein

26203 Basswood Ave.  
Rancho Palos Verdes, Ca  
90275

2001 08:59

ANDREW CARNEGIE MIDDLE SC

1310 830 9015

RECEIVED

APR 04 2001

Dear Mayor, Members of the City Council and Planning Commissioners,

4-4-01  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

This letter is concerning the Long Point Resort.

In October 2000, my daughter Angela Lukstein, a twelve year old seventh grader, said  
,"Mom, sell my pony; I want to play softball."

After discussion, I agree to sell her pony which she had also outgrown and she signed up  
for the Palos Verdes Girls Softball League. What a wonderful, organized program they  
provide for girls 8-16 or so!!!

But they need better facilities for practice and their games. Their main location is  
Pedrigal School and it is very crowded with four games going on at the same time in a  
limited area for playing and parking. There could be a recreational complex at Lower  
Long Point Resort.

Please consider making the Long Point Resort area also an area for recreation for the  
children of PV like my daughter Angela who loves to girls softball.

Who knows that with better facilities we may also be the home city for another Olympic  
great like Long Beach did for Fernandez!

Thanks for listening,



Janis and Edward Lukstein

26203 Basewood Ave.

Rancho Palos Verdes, CA 90275 (310) 375-8160

149A

310 375-8160

**Long Point**

---

To: davids  
 Subject: Fwd: Answer to your question.

From: RONLEAMAR@aol.com  
 Date: Sat, 17 Feb 2001 01:48:17 EST  
 Subject: Fwd: Answer to your question.  
 To: mueller@earthlink.net, lese@rpv.com, joelr@rpv.com, Fnplyon@cs.com,  
 tlong@nassaman.com  
 X-Mailer: AOL 5.0 for Windows sub 130

Return-path: <RONLEAMAR@aol.com>  
 From: RONLEAMAR@aol.com  
 Full-name: RONLEAMAR  
 Message-ID: <e0.1077baf7.27bf6878@aol.com>  
 Date: Sat, 17 Feb 2001 00:39:04 EST  
 Subject: Answer to your question.  
 To: PVNedit@aol.com  
 MIME-Version: 1.0  
 Content-Type: text/plain; charset="US-ASCII"  
 Content-Transfer-Encoding: 7bit  
 X-Mailer: AOL 5.0 for Windows sub 130

What is the best answer ? That answer is obvious. Look around at the rest of the nation and see how fast cities are gobbling up land to preserve as open space. In regard to the upper Point Vicente property, the highest and best use would be to keep the natural park under the ownership and free use of the citizens of Rancho Palos Verdes and restoring the native habitat environment. Natural beauty and peacefulness are priceless. The notion to give that away in exchange for a minute fraction of the worth of the property is foolish.

There are few things as precious as the look in a child's eye when he experiences the wonder of nature. Maybe it will be the instant he first discovers the tiny hummingbird nest or watches a hawk swoop down and pick up a snake and fly away. Perhaps it will be the fourth grade girl who has just finished reading Island of the Blue Dolphins, who sits on this natural bluff parkland and gazes across the sea at Catalina Island, trying to imagine spotting smoke signals. Then again, it could be the local students at Marymount College collecting data in a Quantitative Survey of the native plant restoration effort at this site. It may be a local high school student who has just planted a native plant on the site and announces to the group, "When I am old, I will bring my grandchildren here to show them this park and tell them I planted these plants."

These experiences have already happened at another place on the peninsula known as White Point Nature Preserve in San Pedro. This can become reality here in Rancho Palos Verdes.

**150A**



## Long Point

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As a former Nike Site, it too, was deeded to the city to be used as a public park. The City of Los Angeles help dedicate it as a nature preserve last spring. The largest group of supporters behind the effort to restore White Point were educators who knew the value of a natural park for children. It is the concept of the outdoor classroom experience. There is no way in the world that an indoor lesson about nature can be as meaningful or valuable as an outdoor experience of the real thing.

It is the best of times when this land in our city, that was once used as a place for weapons of mass destruction, is restored to a place of beauty and peace.

Let this also be a lesson to our children.

Leah Marinkovich  
Rancho Palos Verdes

**150A**

Les Evans, 12:59 PM 4/2/01 -0700, Fwd: April 3rd and 10th Meetings

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 02 Apr 2001 12:59:20 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: April 3rd and 10th Meetings

From: RONLEAMAR@aol.com  
Date: Mon, 2 Apr 2001 13:47:19 EDT  
Subject: April 3rd and 10th Meetings  
To: CityCouncil@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10513

Dear Mayor Lyons, Members of the City Council and Planning Commissioners:

As parents of a PVPGSL softball player and as residents of Rancho Palos Verdes, we do **not** support the Long Point Resort developers plan to use **publicly** owned Upper Point Vicente Park for a golf course.

Even though it may benefit our daughter to support it, we will not ask the rest of the children in Rancho Palos Verdes to give up their **public coastal park** for a golf coarse.

We hope that your priorities are focused first and foremost on Rancho Palos Verdes residents and their children.

Sincerely,  
Mr. and Mrs. Ronald A. Marinkovich

151A

RECEIVED

MAR 13 2001

BETTY MARLR  
32724 COASTSITE DRIVE #208  
RANCHO PALOS VERDES,  
CALIFORNIA 90275  
310-265-8820

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 10, 2001

Mayor Lyon, Members of the City Council and Planning Commission,  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Members:

For some time I have intended to write to you regarding The Long Point Resort Development.

It seems to me that all I read about the development in the local paper are negative remarks by a few. So lets consider the positives. First of all when did parks and golf courses not become open space - especially beautiful open space? Why are native habitat and endangered species more important than the benefits for the people who live on the Peninsula?

The financial support that the development would bring to our City would be very beneficial to all who live on the Peninsula. Now the City Hall Property is not attractive and Golden Cove is pitiful. It is the laughing downtown of Rancho Palos Verdes! Both Palos Verdes Estates and Rolling Hills Estates have spent a great deal of money to beautify their cities. You don't have the funds to improve either the City Hall property or Golden Cove.

The Hotel would provide us with amenities that we now have to leave the Peninsula to enjoy.

Access to eleven miles of pedestrian and bicycle trails and walkways from the bluffs to the shore would be a big asset.

The area around City Hall would be so improved with a few holes of golf, a park with picnic tables and benches and a photographic outlook point.

Some people object to the City leasing land to Long Point for several holes of golf. Why? It will be open space to the public. The plans provide for planting 80% more habitat than there is now and it will be protected. In all there will be five new public parks - all open space.

152A

March 10, 2001

The City isn't going to give that land to Long Point. The City will still own it. Plus it will be improved.

We live at the Palos Verdes Bay Club. We drive by that deserted, neglected, ugly Long Point area several times every day. We would be thrilled to have such a beautiful development for our neighbor.

Please don't delay with your approval of the project. The Developers have done their homework, listened to the Public and made many requested changes. Please don't, "knit pick".

Sincerely,

A handwritten signature in cursive script that reads "Betty Marler". The signature is fluid and elegant, with the first name "Betty" and last name "Marler" clearly distinguishable.

Betty Marler  
Broker Associate  
Prudential California

152A

BETTY MARLER  
32724 COASTSITE DRIVE #208  
RANCHO PALOS VERDES,  
CALIFORNIA 90275  
310-265-8820

APR 03 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

April 2, 2001

Members of the Planning Commission  
Mayor Marilyn Lyon  
Members of the City Council  
City of Rancho Palos Verdes, CA 90275

Dear Members,

My husband and I attended the Planning Committee of March 10, 2001. After that meeting it was my intent to request the opportunity to speak at the next meeting. Unfortunately we will be out of town. Instead of speaking, I am writing this letter in hopes that you will think it important enough to read to the audience.

In all respect and gratitude to. "Save Our Coastline I", if it had not been for them we probably wouldn't be discussing the issue of a Resort Hotel.

In the early 1970's, the land at the foot of Hawthorne Boulevard and Palos Verdes Drive West, was located in Los Angeles County. It was zoned single family residence, minimum acre lots. It was owned by a developer. The developer had a variance from the Los Angeles County Board of Supervisors to grade for multiple residence and was really moving the dirt around.

If, "Save Our Coastline", had not organized and succeeded in incorporating the land into Rancho Palos Verdes, our coastline would have looked like the Redondo Beach Coastline of high rise condominiums. The land is now being developed into multiple million dollar Show Case Homes on one acre lots.

Tonight lets consider what a Resort Hotel at Long Point would do for the City of Rancho Palos Verdes.

The Long Point Resort Development has reduced the construction of an eighteen hole golf course to nine holes. They believe the Resort Hotel will not be viable without at least a nine hole golf course. To lease the city land for four holes of golf is not going to destroy the land, It will be more beautiful, have more habitat, hiking trails and picnic areas than it ever would otherwise.

153A

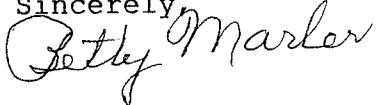
At the last meeting I listened to all the comments about how dangerous a golf course is. We have a home in the desert on the thirteenth fairway of an eighteen hole golf course. We love the beautiful open space and enjoy setting on the patio to watch the golfers drive by. We have never been hit by a golf ball since we purchased it in 1979.

Now how can we help Rancho Palos Verdes with an estimated income of four million dollars plus a year from tax revenue and other fees, if the City grants approval to the developer for a Resort Hotel?

1. Remove the lead from the Interpretive Center - Estimate \$2,000,000
2. Replace the storm drains on the east side of the Peninsula - estimate \$10,000.000.00
3. Eliminate the need for a utility tax and any other personal city tax on property. Because of the tax revenue from the commercial area in Rolling Hills Estates, it is the only city on the Peninsula that doesn't have a utility tax or other city property tax.
4. Tear down the old government buildings that compose City Hall Build a beautiful City Hall with all the departments located in one building. Palos Verdes Estates, Rolling Hills Estates and Rolling Hills have lovely City Hall Buildings.
5. Renovate Golden Cove. Recently I read an article to the Editor in the Palos Verdes Peninsula News that if you sell the grocery market to a school, we will never be able to have a market in Golden Cove. Surely with all of the expensive homes that have been built and are being built near Golden Cove we would support a nice market.

Golden Cove could be beautified with trees and flowers like Malaga Cove Plaza, Lunada Bay, Peninsula Center and Rolling Hills Estates Commercial Area but not without lots of money.

It is my belief that the majority of the residents in Rancho Palos Verdes really want the Long Point Development and could care less if you let them have four holes of golf on Rancho Palos Verdes property. Unfortunately they are the silent majority.

Sincerely,  


153A

Connie McCarthy, 08:50 AM 2/17/01 -0800, Please aquire Parcel for for RPV

---

From: "Connie McCarthy" <cvtn@worldnet.att.net>  
To: <CityCouncil@RPV.com>  
Subject: Please aquire Parcel for for RPV  
Date: Sat, 17 Feb 2001 08:50:53 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2615.200

To the City Council,

W would like to let you know that we are greatly in favor of the city spending \$3,834,000 for the acquisition of the property, known as "Parcel 4-- even if it means higher taxes.

154A

Also-- please do NOT let the upper Vicente land go to the Long Point developer (you might as well send it to the moon for all the good it will do for the residents of RPV)-- but keep it for the city as some type of open space. Just because no plan is in place at the moment is no reason to lose it forever. The open space here is dwindling all too rapidly, and RPV will end up being just like the rest of LA, only people will have further to drive-- so they'll move.

154B

Another concern we have is the now closed lower Point Vicente Park. I guess we are becoming paranoid, but we are getting very worried that it is some type of long term "conspiracy" to allow people to become accustomed to its being closed, so that it will not come as so much as a shock when you let a developer have it.

154C

We have been missing that lovely park terribly.

Thank you,

Jim and Connie McCarthy  
3200 La Rotonda Drive  
RPV

Louis R. McCreight  
101 Cresta Verde Drive  
Rolling Hills Estates, CA 90274

RECEIVED  
MAR 13 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 10, 2001

Dear Mayor Lyon, Members of The City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hathorne Blvd.  
Rancho Palos Verdes, CA 90275

Re The Long Point Resort

I'm writing, as you know as an ex R.P.V.  
resident to strongly support the proposed Long  
Point Resort plan before the Planning Commission.  
Actually, we only live about 100ft from R.P.V. so we  
still have our health & many afflictions there.

The Long Point Resort development will benefit  
the entire P.V. Peninsula by providing our only  
hotel and destination resort. So please quickly  
refine as necessary and pass on it for yours  
and our benefits.

With best personal regards,

Sincerely,  
Lou McCreight

155A



Stephen McDannold

COMMENT NO. 156

RECEIVED

3/12/01

MAR 14 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

DEAR MAYOR LYON,

THIS LETTER IS WRITTEN IN  
SUPPORT OF THE LONG POINT RESORT.  
THE PROJECT WILL BRING AMENITIES  
TO THE PENINSULA WHICH ARE  
NEEDED AS WELL AS ADDITIONAL  
TAX REVENUE.

THE PRESENT SITE IS AN EYE  
SORE THAT HAS REMAINED FOR  
MUCH TOO LONG IN ITS PRESENT  
DECAYED CONDITION. IN ADDITION  
THE RESORT WOULD HELP OTHER  
AREAS SUCH AS GOLDEN COVE  
CENTER WHICH IS ON ITS LAST LEGS.

PLEASE BRING THE DELAYS  
IN APPROVING THIS PROJECT TO AN  
END. HOW MANY YEARS IS THE  
CITY COUNCIL GOING TO DRAG THIS  
PROCESS OUT?

STEPHEN & LINDA MCDANNOLD

1716 PASEO DEL MAR

PALOS VERDES EST CA

90274

310/763-2112 (DAYS)

156A

Les Evans, 11:47 AM 3/9/01 -0800, Fwd: RE: Update - Long Point Information being circulated by

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Fri, 09 Mar 2001 11:47:20 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: RE: Update - Long Point Information being circulated by  
Destination Resorts for Planning Commission Meeting March 13, 2001

Reply-To: <programa@home.com>  
From: "Madeleine McJones" <programa@home.com>  
To: "Citycouncil" <citycouncil@rpv.com>  
Subject: RE: Update - Long Point Information being circulated by Destination Resorts for Planning  
Commission Meeting March 13, 2001  
Date: Fri, 9 Mar 2001 11:36:30 -0800  
X-Mailer: Microsoft Outlook IMO, Build 9.0.2416 (9.0.2910.0)  
Importance: Normal

157A

Please See the attached document regarding the long point-points....



Long Point.doc

March 9, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Mayor, Members of the City Council and Planning Commissioners:

Re: The Long Point Resort

Old Marineland is scared but it is not an eye sore, get new eyes! Manicured golf courses and trails are eyesores to many people. The environmental manicured replacements with paved walkways are hideous. This is a museum for nature, this not open space. Not every one likes curbs and pedestrian walk ways, neatly placed benches. Any parking invites more impact to all environment, it opens the nature to access, yes isn't access nice, they always wave access don't they? Access of humans is not nice if you are a hawk trying to get a mouse out of a hole or a mussel getting stepped on or a starfish getting pried off a rock to be left on the sand. It is only nice to greedy space and money hungry humans. We have plenty of city parks, picnic facilities that are underutilized today. Do not wave more parks as a carrot! Clearly we have got enough human access; it is time to let Mother Nature have some access!

In the message points they tout that the new resort will be like del Coronado (which does NOT have a golf course that I know of). Then they say a resort cannot make it with out a golf course, I am confused! Well I state that a high scale resort will not make it either way, we are not a resort destination and most people have accommodations for guests in giant homes. We do not have a zoo a racetrack or any other attraction. When this resort falters then we will have more eyesores, just, new eyesores.

I do think that it would be great to have a place to hold community events but I do not think it needs to be a resort, I think it needs to be like the wayfarers chapel something that blends with nature, minimal and yes we put on sweaters if it is cold, but we may see a wild flower also. I would promote with the features we have already nurtured on this coast successfully and provide more open-space to human related structures. I say the developer has not done his marketing homework, the resort will wither, and where a natural structure surrounded by open space would draw all the community and use more local businesses on an as needed basis. Something like a small Wolf Trap <http://www.wolftrap.org/> designed to be in harmony with the natural setting that would provide all of the entertainment and celebration needs, but use local catering and services. What a location for that kind of asset and if we used the original Marineland building footprint we would cause NO impact and also clean up the place.

Jobs will be provided, but not to residents of RPV but to outlying cities, work like room keepers and gardeners these people drive in and park this will be more traffic right thru the slide every day. Many people living here have beautiful ocean views and fine kitchens in which to cook brunch the resort will support incoming visitors, not residential needs, thus traffic. Most people from the community have tried the Ocean Trails facilities once just to see and are not planning to patronize them regularly. So how is that facility doing financially? My clubs meet at their own clubhouses and these clubhouses are available to other clubs for usage so get over that argument.

I portend failure in the plans and I see another way, but I am sure the developers have spent to much money on the drawing board in the good ole' resort algorithm to even consider to try some other more unique path. Pity they are going the wrong way. We should not support them with any of our city land for their debacle.

Sincerely don't make me say I told you so,

M. MCJONES  
#3 Tangerine Road RPV

157A

**Long Point**

---

To: davids@rpv.com  
Subject: Fwd: RPV City Hall Property

From: Rwmcjones@aol.com  
Date: Mon, 12 Feb 2001 19:05:33 EST  
Subject: RPV City Hall Property  
To: PVNedit@aol.com  
CC: CityCouncil@rpv.com  
X-Mailer: 6.0 sub 10506

I strongly urge the city council to reject the proposed use of city property for a privately owned golf course. The proposal of the SOC II group best serves the needs of the residents and is most consistent with the conditions laid down by the Army when the land was turned over to the city.

There is a seldom mentioned artifact under the city hall property, namely the hardened facilities for storing and deploying the NIKE anti-aircraft missiles which were once based there. As recently as twenty years ago, the underground storage and elevator complex was fully functional. It reminded one of the hangar deck and elevator of an aircraft carrier. The army would not have abandoned the facility if it offered the possibility of future military value; however, it does represent a valid example of a powerful and expensive defense system. Tours through the facility would be interesting and educational to current as well as to future generations. It would be inexcusable to allow this complex to be destroyed or to pass into private hands.

**158A****158B**

RECEIVED  
FEB 12 2001  
PLANNING, BUILDING  
& CODE ENFORCEMENT

**RECEIVED**

RECEIVED

MAR 28 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

**Dick Meng  
6601 Lautrec Place  
Rancho Palos Verdes  
California  
90275**

**March 28, 2000**

**Dear Rancho Palos Verdes Planning Board,**

**My wife and I have lived here since 1971 overlooking the proposed York development area, which, needless to say, we have enjoyed, primarily because of the wonderful open spaces Rancho Palos Verdes planned many years ago.**

**We ask you NOT to consider turning over our public park land to a private developer, who would eventually probably do whatever he wishes with the property, which would then cause the City to try to correct it, possibly in vain. Things have a way of usually going further than what was originally intended. We need the constant watchful eye of the city council to protect this unique area called Rancho Palos Verdes. To date, each property owner has to be pleased how our land values have continued to increase. The City has worked hard to insure this and we hope that you continue to maintain this outlook.**

**Mr. York must fit his profit making resort on the land that he is able to purchase, rather than designing the resort and then attempting to acquire the necessary land. Let us all look to the long term future of Rancho Palos Verdes, rather than to the short term financial gain that probably will come back to haunt us.**

**sincerely yours,**

  
**Dick Meng**

159A

BRUNO MICHETTI, 12:20 PM 3/9/01 -0800, Proposed Golf Course at Nike Site

---

From: "BRUNO MICHETTI" <bjm34@home.com>  
To: <finance@rpv.com>, <planning@rpv.com>  
Subject: Proposed Golf Course at Nike Site  
Date: Fri, 9 Mar 2001 12:20:02 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2919.6600

I truly hope that you would seriously consider the proposal of SOCII to the Rancho Palos Verdes City Council to develop the old Nike Site as a passive park for all to enjoy instead of only a few if the property is given to the developer of Long Point for a golf course. Many people would volunteer their time and money to help develop such a park there and it would be a lasting legacy to the people of Rancho Palos Verdes, the rest of the Peninsula and the South Bay. I've lived here for 30 years and with much dismay have watched the open spaces being steadily developed...we have such a wonderful opportunity to keep this property for the enjoyment of all and not just a few. Thank you for your consideration.

160A

Les Evans, 09:47 AM 3/9/01 -0800, Fwd: Proposed Golf Course

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Fri, 09 Mar 2001 09:47:45 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Proposed Golf Course

From: "BRUNO MICHETTI" <bjm34@home.com>  
To: <citycouncil@rpv.com>  
Subject: Proposed Golf Course  
Date: Fri, 9 Mar 2001 09:32:55 -0800  
X-Mailer: Microsoft Outlook Express 5.00.2919.6600

I attended my first city council meeting last month and was very heartened by the council's consideration of the excellent proposal made by SOCI in favor of a passive park at the Nike site instead of a golf course. It seemed to me the first time that the council actually had listened to the residents' wishes regarding open space on the Peninsula. I understand that the Long Point developers are wooing residents by wining and dining them so that the residents will think that giving that land to Long Point for a golf course is the wisest choice. I just wonder how many of those residents would actually play golf on that property....wouldn't a better use be a passive park for ALL residents, and non-residents, too, to enjoy in perpetuity? Please do not be swayed by the Long Point developers - once that land is gone, it is gone forever and we will have lost a priceless opportunity for future generations. Thank you for your consideration.

161A

March 8, 2001

Mayor Lyon & Members of the City Council & Planning Commission  
City of Rancho Palos Vds  
30940 Hawthorne Blvd.  
Rancho Palos Vds, CA 90275

Dear City Officials:

I would like to express my support for the Long Point Resort development. This property has been standing vacant for far too long and is a detriment to the city as well as to its citizens. Because there are plans for parks and 11 miles of hiking/walking trails, it will bring many benefits to not only the people that live here, but also to tourists/visitors.

162A

My only concern is PV South. I have lived here since 1973 and with the many housing developments that have been built during this time, the traffic has tripled. The Long Point Resort would not have the traffic that Marineland did, but would add to the already overburdened PV South. Also, the condition of this road is in question.

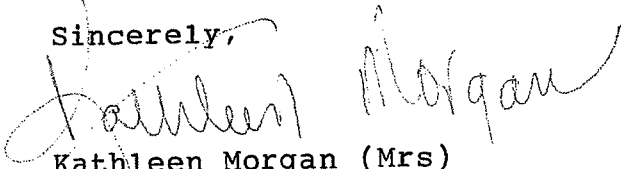
162B

Hopefully, Long Point and the City Council can come to an agreement and get on with beautifying a very ugly eyesore in RPV.

162C

Thank you.

Sincerely,

  
Kathleen Morgan (Mrs)  
32709 Seagate Drive #105  
Rancho Palos Vds, CA 90275

cc: Long Point Resort



Les Evans, 07:40 AM 3/27/01 -0800, Fwd: Upper Point Vicente land

---

X-Sender: LesE@207.238.114.197  
 X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
 Date: Tue, 27 Mar 2001 07:40:21 -0800  
 To: davids@rpv.com  
 From: Les Evans <lese@rpv.com>  
 Subject: Fwd: Upper Point Vicente land

From: "Dorrine Nay" <dorrine@home.com>  
 To: <CityCouncil@RPV.com>  
 Subject: Upper Point Vicente land  
 Date: Mon, 26 Mar 2001 19:48:55 -0800  
 X-Mailer: Microsoft Outlook Express 5.00.2615.200

Dear Mayor, Members of the City Council and Planning Commission  
 City of Rancho Palos Verdes

Re: The Long Point Resort

My husband and I have been residents of Rancho Palos Verdes since 1972. We have seen a lot of development over these years. One of the great aspects of the Peninsula is getting away from the City (LA). When I return home, I feel like I leave the stresses behind as I come up the Hill. But the open spaces are disappearing. Once the open spaces are gone, they cannot be recovered. Please help preserve that country feeling, please keep land open for walking trails, watching wildlife, and watching sunsets.

I strongly believe that the Upper Point Vicente land should be used for public recreation. The Long Point Resort plan to use it for a golf course and practice range is not a public use, it is a private, for-profit use which will benefit the owners of Long Point.

The transfer of the Upper Point Vicente land from the US Government to the then newly-formed City of Rancho Palos Verdes was intended to benefit all of the citizens. To use the land for a private enterprise is wrong. The tax money that the owners of Long Point may pay can not repay the citizens for the lost open space and/or recreation space.

The City of Rancho Palos Verdes is not poor and should not act that way. Potential income from taxes should not be a determining factor in this situation.

The original, approved plans for Long Point still have merit. A destination resort would be an asset to the community and would clean up the old Marineland site. The developer should be encouraged to work on his own property.

Once the Long Point owners have control of the land, we may see additional barriers to public use. That is what is happening with the development at the end of Hawthorne Blvd. The citizens of RPV are not welcome to walk there even though the streets are public. The addition of the "observation" booths will increase the feeling that we are not welcome to walk there. The recent Long Point mailer talks about all the trails, etc., that they are incorporating for our use but I doubt that citizens will be welcome unless they bring money to spend.

Please allow the citizens to have full input on this issue. This can be done by surveys or by putting it on a ballot. Please do not make any commitments to the Long Point owners before taking the step of getting

163A

citizen input. This is a decision that cannot be rescinded once the land has been given away.

Dorine Nay  
30147 Via Borica  
Rancho Palos Verdes

**163A**

*Wane Snow***RECEIVED**

MAR 14 2001

PLANNING, BUILDING,  
CODE ENFORCEMENTKaryl Newton  
46 Oceandire Drive  
Rancho Palos Verdes  
CA 90275Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: PROPOSED DEVELOPMENT OF LONG POINT

Dear Mayor and Members of the City Council and the Planning Commission,

I am very much in favor of the Long Point Resort. Look at Pebble Beach and the area around Carmel. People and Nature can live in harmony. There are prosperous hotels, shops, golf courses AND lots of open space and rugged coastline for residents and tourists to enjoy and explore.

**164A**

What do we have right now around Long Point? Weeds and an empty parking lot. No one is enjoying it. What a waste.

I think the developers are very capable of realizing their project and sincere in their plans to create trails, parks, and protect wildlife habitats, AND build a beautiful hotel that will bring much needed revenue to the City of Rancho Palos Verdes. Marineland has been gone for more than 15 years. How much more time are we going to waste?

Sincerely,

*Karyl Newton*

Karyl Newton

FROM : J.H.NUNN ASSOCIATES

FAX NO. : 310 541 0200

Apr. 05 2001 11:50AM P2

Mar 29 01 07:43p

Janet Driskell

(310) 265-0504

P.2

Page 1

## PUBLIC COMMENT FORM

## PROJECT NAME:

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

JOHN NUNN  
6713 VALLEON DR.  
PALM CA 90275

Telephone Number:

(310) 541-2689

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

TO: → This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

The City of Rancho Palos Verdes was founded on the principal of protecting open space. As time goes on open space becomes more and more scarce. The City Hall site in particular is irreplaceable open space donated to the city by the Air Force. Since there are no more slushes of Federal land existing in the city it is up to us to protect the small amount of open space left.

If there is some parkland development it should be for general use and not to primarily benefit a high commercial venture by providing an attraction primarily for that region's residents. Local folks will not be flocking to play on a 9 hole course.

I recommend that the City Council reconsider and keep the City Hall site open space or at most a small area developed for general use park.

Therefore,

John Nunn

165A

FROM : J.H.NUNN ASSOCIATES

FAX NO. : 310 541 8299

Apr. 05 2001 11:50AM P1

Mar 29 01 07:43p

Janet Driskell

(310) 265-C504

p.3

## PETITION TO THE CITY COUNCIL OF RANCHO PALOS VERDES

I urge the City Council to retain all public land for  
general public use or open space.

Print Name	Street Address	City	Signature	Date
JOHN NUNN	6713 VALLON DR.	RPV	<i>John Nunn</i>	4/4/01

WE ARE AGAINST

The new plan for the Long Point Resort still includes 58 acres of the public's land around City Hall. The developers have reduced their golf course to 9 holes (already approved for their own 103 acres), but they want to place 4 of the holes and a practice facility on public property.

Please return petitions to SOC II, P.O. Box 3984, Palos Verdes Peninsula, CA 90274 when complete.

Collected by Bowland Driskell  
30 VIA CARPI  
RPV CA 90275  
310.544.4183

165A

## PUBLIC COMMENT FORM

APR 03 2001

PROJECT NAME: LONG POINT Resort Project. PLANNING, BUILDING,  
& CODE ENFORCEMENT  
Program Environmental Impact Report (EIR) for the Long Point Resort Project.

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

OSAIR OMAR & BARBORA OMAR  
27 VIA SAN REMO, RPT, CA 90275  
(310) 544 8862

Telephone Number: (310) 544 8862

COMMENTS: Reject using public land. Down size hotel to  
No Golf course next to Villa Capri 20 rooms.

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.

Negative impacts:

- \* Overcrowding eff of traffic & people
- \* Pollution
- \* Attracts unsolicited business
- \* Hotel bring prostitution & drugs with them
- \* Destruction of beautiful coast line  
for only a handful people who don't  
care about the general condition of  
the area
- \* Destruction of trust in our principals  
by abusing land that belongs to current  
& future generations
- \* For all these past centuries all these  
generations protected the public land by  
every means, financially by paying  
taxes & physically & mentally being  
involved in public service, are being  
betrayed if let a private firm take nearly  
financial advantage for a few investors.

Conclusion: Against use of public land. NO 400 room hotel  
& NO more golf courses.

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*Osair Omar*  
*Barbora Omar*

cc for

MAR 12 2001

3/10/2001

Dear Mayor, Members of the  
City Council, and Planning  
Commissioners.

Re the Long Point Resort.  
the opportunities have been lost  
in the past on Mainland.

Property. Lets not blow this  
one, Lets do it the people  
will benefit, and so will the  
City. some people object to any  
portion of the resort project being  
placed on publicly owned land.

the disagree at this should be  
opened up for the enjoyment of  
the entire Community. Lets  
make it work this time.

these people that object dont  
even like Jesus.

Thank You  
Mary & Charlie Owen.

167A

Les Evans, 08:32 AM 2/13/01 -0800, Fwd:

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 13 Feb 2001 08:32:12 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd:

From: "Patricia Ott" <ott2dp@email.msn.com>  
To: <citycouncil@rpv.com>  
Subject:  
Date: Mon, 12 Feb 2001 18:20:18 -0800  
X-Mailer: Microsoft Outlook Express 4.72.3155.0  
X-OriginalArrivalTime: 13 Feb 2001 02:13:50.0821 (UTC) FILETIME=[9B1F0950:01C09562]

Hello - Regarding the Long Point dilemma. Like the hill, my husband and I have differing opinions regarding the development of city property. We both would like to see something developed on the old Marineland area because we feel it is truly an eyesore, but I would not like to see city property given away in order to achieve this renovation. My husband would not oppose giving up city property in order to renovate this particular area. I feel we should call the developers bluff and deny him the extended property. Let's see what his company can come up with in order to make this project financially viable to all. Thank you, Don and Patty Ott.

168A

RECEIVED  
FEB 13 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT



March 12, 2001

RECEIVED

MAR 19 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

David Snow, AICP  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Mr. Snow:

RE: Long Point Resort Hotel -- Four short points

1. We need a hotel. There is no hotel on the Palos Verdes Peninsula. Visiting relatives, wedding receptions, conferences, etc. must go to Redondo, Torrance, even San Pedro has three hotels.
2. The Environmental Impact Report was positive. Once there was a Marineland everyone could enjoy. Please allow a Long Point Resort Hotel that everyone can enjoy. It doesn't take any effort to say "no," but this country was built by people who said "yes," from log cabins to skyscrapers, these builders knew that people were more important than gophers.
3. The argument that Long Point will be using public land for a private golf course is unenlightened. First, it is a public golf course. Second, there will be a public pathway and a public park on private land with a far more scenic setting than the public land. It's a trade, a trade that will benefit everyone.
4. And finally, it is just not fair that a person can buy a piece of property and pay taxes on it year after year and be hassled about what he wants to put on his property, especially when he's jumped through all the hoops. Long Point is not just for the benefit of this property owner, his property is being opened up for the benefit of--not just everyone on the peninsula-- but it will also attract people from all over the country. It will bring in anywhere from 4 to 5 million dollars a year to the City of Rancho Palos Verdes for the benefit of all its residents. It's a win win, win, win for everyone.

Please say "yes."

Sincerely,



Angie Papadakis  
28655 Roan Road  
Rancho Palos Verdes, Ca 90275  
(310) 832-1946 fax (310) 832-1551

169A

RECEIVED

MAR 12 2001

William & Sandra Patton Jr.  
71 Marguerite Dr.  
Rancho Palos Verdes, Ca 90275

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 10, 2001

Planning Commission  
CITY OF RANCHO PALOS VERDES  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Re: Long Point Resort

Dear Commissioners:

This shall confirm our strong support of the Long Point project, and we welcome such a development to our community. We do believe this development will add substantial resources and capabilities that this community does need, and will find of great benefit in many ways.

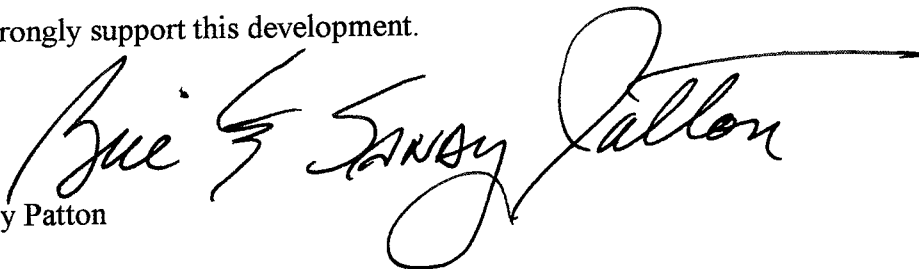
We are quite pleased with the overall plan of utilization, especially the extensive system of trails that will be provided and, of course, all of the amenities that our community has long been lacking. While some may have unfortunately not supported this plan, we do further understand that it will significantly increase the natural habitat area over what currently exists, and that there will be less traffic to the resort than there was when the property was operated as Marineland.

Last it certainly will be to all of our benefit to have this beautiful and usable new resort development, rather than the presently undeveloped site, which could not be considered a benefit to our community by any stretch of the imagination.

Again we strongly support this development.

Sincerely,

Bill & Sandy Patton

A large, stylized handwritten signature in black ink, appearing to read "Bill & Sandy Patton". The signature is written over the printed name and extends across the right side of the letter.

170A

## PUBLIC COMMENT FORM

RECEIVED

MAR 20 2001

## PROJECT NAME:

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Program Environmental Impact Report (EIR) for the Long Point Resort Project.

## NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Mr. & Mrs. Mark O. Payne44 Via CapriRancho Palos Verdes, CA 90275Members of the Villa Capri Home Owners AssociationTelephone Number: (310) 377-6678

## COMMENTS:

Please provide your comments on potential environmental issues/impacts which you feel should be addressed in further detail in the subject Program EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to City Staff at the Scoping Meeting or mailed to the City of Rancho Palos Verdes, 30940 Hawthorne Boulevard, Rancho Palos Verdes, California 90275, Attention: Mr. Dave Snow, AICP, Principal Planner.


Dear Mr. Snow,

My wife and I, together with all of the local neighbors with whom we have been in contact, vigorously oppose the building of a driving range on the land adjacent the south border of the Villa Capri Town Homes. A facility such as this would be a serious detriment to the environment and well being of the families who live here. The noise from driven balls, voices, ball retrieving machinery and grounds maintenance would be quite excessive. Any sound produced in this area as far as R.P.V. City Hall is amplified by the shape of the terrain and carried down the hill directly to the townhouses by the prevailing winds.

There would be a constant danger to the residents and property from stray golf balls, even if the layout of the range encouraged people to hit them away from the buildings. (The harder a person drives a golf ball, the less directional control he is able to exercise over it.) This problem would eventually require the erection of unsightly safety nets. It is likely that bright-ugly outdoor lights would have to be installed to allow for late afternoon and evening operations during Fall and Winter.

For these environmental (and obvious security reasons) we strongly urge you not to approve the proposed driving range.

Sincerely,

  
Mark and Dianna Payne

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Sheryle Payne, 10:04 AM 3/4/01 -0800, Long Point Development Draft EIR

---

Date: Sun, 04 Mar 2001 10:04:20 -0800  
From: Sheryle Payne <dodgerstb@earthlink.net>  
X-Mailer: Mozilla 4.72 [en] (Win98; U)  
X-Accept-Language: en,ja  
To: planning@rpv.com  
Subject: Long Point Development Draft EIR

**RECEIVED**  
MAR 15 2001  
PLANNING, BUILDING,  
& CODE ENFORCEMENT

For: Mr. Rojas and Mr. Snow

Gentlemen:

Approximately three weeks ago I received a copy of the draft Environmental Impact Report (EIR) for the Long Point Development project and have spent several hours in reviewing the voluminous details contained within its pages. Of particular interest to the Homeowners Association that I represent are the sections which address the use of the Upper Point Vicente (UPV) property for golf and more specifically the location of the driving range that is shown in the plans as being located directly behind our townhomes. Within the EIR Appendix at Section 15.1 are numerous letters and comments from our homeowners and myself, as president of the HOA, expressing our opposition to the location of the driving range and concerns about the use of UPV for golf, I won't re-plow that ground in this e-mail. Our opposition to the driving range has not changed. In addition overall support for the golf course and the Long Point Development has been eroding due to two principal factors:

1. At the time that the eighteen hole golf course was being actively considered and the plan incorporated a driving range in the field behind our townhomes we voiced our objections to the developer on at least two occasions. The first was at an annual homeowners meeting approximately two years ago, at that meeting we were told that the driving range would be placed elsewhere on the project. The second occasion was at a City Council meeting at which our past president, John Douglass, articulated the HOA concerns about the project. On both of these occasions the developer, specifically and personally, promised us that the driving range would be placed elsewhere and he would respect our concerns about the negative impact of the driving range on our community. With the advent of the nine hole golf course we find ourselves fighting the same battle and are left with the belief that we have been lied to and betrayed by the Long Point Development people.

2. The SOC II plan has struck a chord with the homeowners in our association, due to the magnitude of the support shown I was asked, as the president, to address this to the City Council, which I did at the meeting of 16 January 2001. At that meeting Councilman Byrd told me personally that the city would not allow the driving range to be located in the field.

172A

I met with Mike Mohler and an associate of his, the week before last, to discuss the EIR and the support by our HOA for the SOC II plan. We had what I believed to be a very frank and open discussion of all of the concerns, issues, and positions that each of us represent. The result of the meeting was that Mike promised to take our concerns to his superiors, however he stopped short of any commitment to change the existing plan for the golf course. I was asked what it would take for our HOA to actively support the Long Point Development and I told him that placement of the driving range elsewhere on the project would be a major step in the right direction. I also told him that the hill that the Lowes Destination Resort people have to climb is a significant issue with trusting the developer and the strong support shown by our homeowners for the SOC II plan. Many of us have major concern about the escalating pace and scope of the developments in RPV, open space is disappearing rapidly, and while revenue streams that flow to the city from other than homeowners are appealing, they are not so if we destroy the qualities that drew us to the Peninsula in the process.

172A

I appreciate your consideration of these comments and welcome any questions you may have.

Sincerely,

Paul A. Payne  
President, Villa Capri HOA  
52 Via Capri  
Rancho Palos Verdes

310-377-5629

13 March 2001

President  
Villa Capri Home Owners Association  
52 Via Capri  
Rancho Palos Verdes, CA 90275

Chairman  
Planning Commission  
City of Rancho Palos Verdes

Dear Mr. Chairman:

Over the past couple of years, the homeowners of Villa Capri have participated in many public comment forums to express our concerns about the proposed Long Point Development project. These concerns are documented in the Appendix of the draft Environmental Impact Report in the form of numerous letters submitted by our homeowners and by the HOA Board. Additionally, we have met with the developer, Mr. Jim York, and with the Lowes Destination Hotels project manager, Mr. Mike Mohler, on several occasions to discuss our position on the project and to work towards a mutually satisfactory configuration of the project. This document is provided to summarize our current concerns regarding the project.

Our concerns fall into three main categories, these are;

1. Degradation of quality of life and negative impact on home values resulting from use of the field behind our townhomes for a driving range.

Of foremost concern to us in this area is the significant and negative impact of the driving range that is incorporated into the plan for the nine-hole golf course. We had addressed this issue with Mr. York, when it was first presented as part of the eighteen hole golf course plan, and he accommodated our concerns by removing the driving range from its planned location and he made a commitment not to place a driving range there in the future. This issue resurfaced when the nine hole golf course plan was made public last year and it incorporated a driving range in the field behind our homes. We expressed our opposition to this plan at an EIR planning meeting on 22 August 2000. Recent meetings and discussions with Mr Mohler have confirmed that Mr. York and Lowes Destination Hotels will continue to honor the commitment made regarding the driving range and to relocate it on Long Point. We do, however, intend to continue a dialogue with the developer to ensure that any golf holes that may be placed in the field are constructed in such a manner as to minimize any impacts of noise, errant golf balls and security. Additionally, due to the unique hydrology of the Peninsula and the history of our complex we remain very concerned about the impact of irrigation of the golf greens and any resultant land movement caused by poorly planned water drainage.

2. Preservation/expansion of native habitat and protection of endangered wildlife.

Some of our homeowners consider the natural beauty and abundant wildlife of the Peninsula to be a key element in the quality of life that we enjoy. Consequently they are concerned about the developers commitment to preservation/expansion of endangered

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wildlife habitat and to protection of those animals that are on the endangered species list. Use of the Upper Point Vicente Area (UPVA) for golf is viewed by them as possibly being incompatible with maintaining the existing habitat and wildlife species populations.

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3. Use of Public Lands for private development.

The presentation of the Save Our Coastline II plan, in mid January of this year, to use the UPVA for recreational/park use has caused many of our homeowners to rethink their position on the Long Point Development project. There is a belief that use of the UPVA for a golf course may not be in the best interests of the residents of Villa Capri.

In summation, we ask that the Planning Commission and City Council of Rancho Palos Verdes hold the developer to the highest standards in addressing our concerns regarding the use of public lands, habitat preservation, protection of endangered species and preserving the quality of life that we enjoy in our city. Lowes Destination Hotels has demonstrated to us that they intend to be a good neighbor and a responsible corporate citizen and we are optimistic that the Long Point Development project will go forward and that it will be a positive addition to our city and the Peninsula.

Sincerely,



Paul A. Payne, President  
Villa Capri HOA

MAR 21 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

17 March 2001

Paul A. Payne  
52 Via Capri  
Rancho Palos Verdes, CA 90275

Mr. Chris Boyd, Editor  
Palos Verdes Peninsula News  
500 Silver Spur Road, Suite 200  
Rancho Palos Verdes, CA 90275

Dear Mr. Boyd;

My purpose in writing is to clarify an article that was printed in the Thursday 15 March 2001 edition of your paper. The article reported on the Tuesday 13 March 2001 meeting of the Rancho Palos Verdes Planning Commission to take public comment on the Draft Environmental Impact Report for the Long Point Development Project. Your staff writer, Mr. Josh Cohen, covered this meeting for the News and the article is under his byline. First I would like to state that overall the article was a well written and well balanced account of the issues that were discussed. However, I believe that the characterization of my remarks was inaccurate and out of context with the written comments that I had provided to the Planning Commission.

174A

The purpose of the meeting was to address the Draft EIR and not necessarily to support or oppose the Long Point Project and I was not at the meeting to do either. However, in order to speak one must fill out a speakers slip which only allows two choices – support or oppose, and I checked the support block. I found out at a previous meeting that making a non-committal third block is not an option. My intent in addressing the Planning Commission at the Draft EIR meeting was to articulate the concerns of the Villa Capri HOA regarding the Draft EIR, as I and the other Board members understand them. We have three principal concerns:

1. Impacts of the driving range and the planned golf course. The driving range issue was satisfactorily addressed at the meeting, however we still have significant concerns over the impact from golf holes if any are constructed behind our homes.
2. Preservation of habitat and protection of wildlife. Many of our homeowners are very concerned about the developers commitment to the avoidance of fragmentation of the existing contiguous habitat.

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3. Use of public lands for private development. Homeowner concern in this area has been shown by the large number of people in our community who signed the SOC II plan petition which urges the City Council to retain all public land for general public use or open space.

When the City Council approved Monaghan plan for Long Point was revived by Mr Jim York of York Long Point Associates over two years ago, it featured an eighteen hole golf course with a driving range planned for the field behind our townhomes. We expressed our opposition to Mr. York and he committed to place the driving range elsewhere on the project, we in turn lent our support to the project. The project eventually evolved to feature a nine hole course instead of eighteen holes, but with a driving range again placed in the field. This turn of events caused a significant change in the attitude of our homeowners and a deep distrust of the developers. In January, when the SOC II plan was made public many of our homeowners signed a petition that was circulated in our community supporting the plan.

At about the same time that the SOC II plan was being discussed I had several conversations and a meeting with Mr. Mike Mohler of Destination Development Corporation and explained to him as clearly as I could our opposition to the driving range and our belief that a promise made by Mr. York had been broken. Mr. Mohler committed to bring this to the attention of his senior management and to convince them to place the driving range elsewhere on the project. The results of this commitment were reported in your newspaper in the article in question. Based on these events described above the Board determined that taking a neutral stand would be in the best interests of our HOA, at this time. That was my intent in speaking at the Draft EIR meeting.

Sincerely,



Paul A. Payne  
President, Villa Capri HOA

Cc: Honorable Marilyn Lyon, Mayor  
Mr. Joel Rojas, Director of Planning

Encl: Written comments of 13 March 2001

174D

RECEIVED

MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

21 March 2001

Paul A. Payne  
52 Via Capri  
Rancho Palos Verdes, CA 90275


SOC II Steering Committee  
P.O. Box 3984  
Palos Verdes Peninsula, CA 90274

Dear Chairperson;

Several weeks ago the SOC II petition urging the City Government of Rancho Palos Verdes to protect the open space of the Upper Point Vicente property and preserve it for a park was circulated within our community, the Villa Capri Townhomes. I had previously read the article about your concept in the Palos Verdes Peninsula News and thought that the concept had a good deal of merit and I viewed the petition as giving our City Government a viable alternative to consider for Upper Point Vicente. Therefore I signed the petition.

Recent events however have given me reason to reconsider my action. These events are unrelated to the SOC II concept or your advocacy of the concept with our City Government, but they are related to the manner in which the petition was presented and advocated within our community. Therefore, I request that you remove my name from your petition.

Thank you,



Paul A. Payne

Cc: Mr. Joel Rojas, Director of Planning, City of Rancho Palos Verdes

175A

MEMO

To: David Snow, Deputy Planning Director

From: D.A. Pehrson

Subject: Long Point Resort Project

RECEIVED

MAR 08 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

After following the progress of the subject Project and now reading the Draft EIR, I was gratified to see the overwhelmingly positive conclusions in all aspects set forth in the report.

Accordingly, I urge the RPV Planning Committee to approve this matter at the earliest possible time. This Project is not only good for RPV but the entire Peninsula.

Sincerely,



D.A. Pehrson  
8 Shadow Lane, RHE

P.S. Thank you for the meeting notices you have sent me.

176A

Les Evans, 12:14 PM 4/3/01 -0700, Fwd: The Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 03 Apr 2001 12:14:50 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

From: NPete377@cs.com  
Date: Tue, 3 Apr 2001 14:55:49 EDT  
Subject: The Long Point Resort  
To: CityCouncil@rpv.com  
X-Mailer: CompuServe 2000 6.0 for Windows US sub 353

Dear Mayor, Members of the City Council and Planning Commissioners:

As a 30 year resident of Palos Verdes and former scoutmaster here, I have had occasion to hike the trails in the area of Long Point, and to regret the lack of proper access to the area. I have also felt the lack of enough public space, such as restaurants with a view, in the whole peninsula area. For those reasons I support the Long Point Resort. I believe that its development will be positive on both of those issues.

I also believe that such a development is likely to provide entry level jobs for many of the youths of this area. Right now, Burger King and McDonalds seem to be just about it, and they aren't even in RPV.

Its golf course will be a pittance compared to the demand for golf facilities in the area, but every 9 holes should be counted as being of some help. The city land involved couldn't be put to a better use, unless it was ALL converted to golf course.

Some will object that any further development of Palos Verdes harms the environment and therefore detracts from the enjoyment of our community and its way of life. In this case, I believe that they are wrong. This development will improve our way of life.

Others will object that the resort will increase the traffic on Hawthorne Boulevard. Undoubtedly true, but not to the extent that Marineland of the Pacific generated traffic. I suspect that the worst of the traffic disruption will be generated during the construction phase, and the normal operation of the resort will be easily accommodated. Its peak traffic need not be at commute times, when Hawthorne presently hits its peak.

The worst aspect of the project, to my way of thinking, will be that it may generate a lot of tax revenue. Right now, the city treasury is so low that only people dedicated to the betterment of our community, such as yourselves, enter local politics. After the tax windfall from the resort comes into play, I fear that local politics will be fair game for villains of all sorts.

Such is the price of progress.

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There will be a natural human urge on the part of many to put their own, personal, stamp on the project. They will want to maximize the financial return to the city, for instance, at the risk of crippling the viability of the resort. That would be folly. The resort should be allowed to make money, even a lot of money. If it is not allowed to make money, it will not be a very good commercial citizen of the community. I believe that our community needs more financially sound commercial citizens, such as the resort promises to be.

177A

Sincerely,

Norman W. Peterson  
27538 Longhill Drive

COMMENT NO. 178

cc  
*Rene Snow*

March 12, 2001

**RECEIVED**

MAR 13 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mayor Lyon,  
Members of the City Council and Planning Commission  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: The Long Point Resort

Mayor Lyon, Members of the City Council and Planning Commission,

As a 40 year resident of the peninsula, I strongly believe in preserving picturesque open space and providing public access to our citizens. I am very positive about the findings in the Environmental Impact Report on the Long Point Project.

Setting aside land for the golf course offers insurance that the diverse recreational needs of our community will be addressed. Over 11 miles of new bicycle, pedestrian trails, and new walkways along the bluffs and to the shore will benefit all.

The Long Point Project is a tremendous addition to our Palos Verdes community and a great asset to the city.

178A

Sincerely,

*Mark Pfeil*

Mark Pfeil

# St Paul's Lutheran Church of Palos Verdes



Norman V. Braatz, Pastor

April 5, 2001 **RECEIVED**

APR 05 2001

Planning Commission  
Department of Planning, Building, and Code Enforcement  
Rancho Palos Verdes, California

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Subject: Long Point Resort Environmental Impact Report

1. Mitigation. The draft EIR observes that the proposed golf course "may cause significant safety affects (sic) on human beings"; however with mitigation such impacts would be "less than significant".

"Mitigation", besides relying on topography, berms, low landscaping, elevation differences, contouring, traps, etc. - all of which a golfer on his best (or maybe even average) day might hit over - basically depends on the statistical probability that the average golfer will keep the ball on the fairway within a certain landing area.

However, according to an Accuracy Table provided to RBF Consulting (RBF) by the US Golf association only 2/3 of "scratch" (par) golfers can be expected to keep the ball within an area over 50 yards wide at 200 yards (Appendix 15.11, Golf Safety Study).

This leaves a significant percentage of golfers who are capable of making errant shots towards St. Paul's and Villa Capri.

**There is no evidence in this draft EIR of mitigation of this risk as to the new hole 3 adjacent to St. Paul's.**

179A

page 1 of 6

2. Course analysis. Other than holes 1 and 9, none of the hole-by-hole analysis in Sec. 5.10-2 corresponds to the correct numbered hole, nor is the Practice Facility analysis relevant; all due to the relocation of the Practice Facility to the hotel site. The discussion in Sec. 10-2 of holes 3 and 4 now corresponds to holes 5 and 6.

179B

3. New Holes 3 and 4. The draft EIR analysis does not discuss new holes 3 and 4 (Sec. 5-10-2)

RBF received in January 2001 a "Second Edition" safety analysis from Kipp Schulties (KS) with the following few comments on new holes 3 and 4 planned next to St. Paul's and Villa Capri (Appendix 15.11):

KS, while generally approving of the new hole 3, states that "the shots from the tee are now more apparently directed toward residential units to the left of this hole than the practice range shots ever were. KS recommends changing the landing area from the tee to the east (away from Villa Capri).

179C

KS also mentions, regarding golf balls flying off the course, "...a little concern ...only potentially knowing the topography left of the hole;"

KS further states that new holes 3 and 4 cannot be safely located as shown on the plan; reserving additional comment on new holes 3 and 4 until a grading plan was completed. (There is no further comment on these holes presumably because there is no grading plan.)

***Sec. 5.10-2 contains no analysis on new holes 3 and 4 whose proposed location can have a significant impact on St. Paul's and Villa Capri.***

4. Standards An appendix to the KS safety analysis of September 2000 contains several pages on "Safety in the Golf Corridor" from a book published by the Urban Land Institute (ULI) entitled Golf Course Development and Real Estate which states, among other significant matters on safety, that the "the standard 300-foot...width...that became a rule-of-thumb in design of a single-fairway layout during the 1960s and 1970s is **seriously outdated in terms of current safety concerns.**"

179D



Kipp Schulties provided this ULI material because the September 2000 safety analysis begins by stating that the proposed Long Point golf course used 1960's and 1970's design standards.

KS makes reference to the ULI standards and materials at least three times in each of its safety reviews sent to RBF (9/00 and 1/01) and in January 2001 even resubmits to RBF the ULI material described above, stating "**I strongly recommend that you review this information because it directly relates to the concerns surrounding the Long Point Resort Project.**" (Appendix 15.11)

KS previously urged in the September 2000 safety review that this ULI information "**should be strongly considered,**" indicating that modifications to the golf course routing "will be needed" for the newer golf corridor widths. (Appendix 15.11)

RBF merely describes in a footnote on page 5.10-17 the new standards to widen golf corridors and at page 5.10-16 states that it "has been considered." RBF is satisfied with the old standards, apparently because KS signs off on the 1960 course design (qualifying such approvals, however, with remarks that old safety standards were used on the old course design).

However, KS repeatedly references the new ULI standards - in effect, putting RBF on notice, ie, if something goes wrong, you were told.

Unfortunately these new standards are only guidelines but they clearly have a strong basis in the reality that **average golfers are capable with today's equipment and balls to hit further than in the 1960's.** (See item 1. above)

As Kipp Schulties stated in its January 2001 review, "this golf course...is struggling to maintain its legitimacy as a regulation nine-hole golf course .... . However...**there is more long-term liability with injury to pedestrians and other golfers if you build the course as it has been routed.**" (Appendix 15.11)

5. Risk to St. Pauls and Villa Capri

***Applying the corridor widths of either old or new standards, new hole 3 does not provide the required golf course safety corridor with respect to parts of PV Drive and St. Paul's and much of Villa Capri.***

There is no consideration of protection of these areas from errant golf shots because the Developer wants the City to believe that somehow this golf course can be "shoehorned" into Point Vicente Park with no impact on anything or anybody. RBF seemingly believes the same thing.

RBF's golf consultant, Kipp Schulties, although approving a 1960 design by 1960 safety standards, suggests (warns) that it is not enough by current safety standards and that this course, as designed, has problems. (Appendix 15.11)

179E

6. Burden of Proof

**The Long Point Project cannot sustain its "Burden of Proof" that the proposed use as a golf course of City property will have no significant adverse effect on adjacent properties and their permitted use.**

The Burden of Proof statement in developer's applications and the conclusions of this draft EIR as regards "no significant adverse effect" on adjacent property or "less than significant" impacts are both mere assertions with no evidence to back them up.

179F

RBF has no safety analysis - none whatsoever - about the proposed new golf holes 3 and 4 adjacent to St. Paul's and Villa Capri in Sec. 5.10 Public Health and Safety.

The conclusion of RBF that the safety risks of this golf course are "mitigated" is based solely on "implementation .... of design modifications" from the Golf Safety Study (Sec. 5.10-2, p. 5.10-29) which KS qualifies more than a few times.

This "safety study" by its own statement on the first page of the September Safety Analysis is simply a "document review" of, as it turns out, incomplete data, by a golf consultant who has never set foot on the property; who, both implicitly and explicitly, qualified his approval; and whose many cautions and recommendations have only been "considered" by RBF... and, to all appearances, ignored.

**Further, in no place in the draft EIR, is there any consideration or analysis of the appropriateness of the golf course being immediately adjacent to residences or a church and its effects on the use of these premises.**

179F

There is clearly a question of the compatibility of these very distinct activities.

There are also the questions of the effect on these adjacent properties of the enormous movements of land to develop the golf course and afterwards the equally enormous amount of watering necessary on the golf course.

**The Burden of Proof specifically raises these issues but the draft EIR does not specifically address these effects on the adjacent properties.**

**The several deficiencies of the analysis, conclusions and supporting documentation of the draft EIR discussed herein cannot possibly comply with the requirements of the California Environmental Quality Act, its Guidelines and the rules, regulations, and procedures for implementation adopted by the City of Rancho Palos Verdes including the Conditional Use Permit.**

Background: St. Paul's Lutheran Church before Planning Commission 3/13/01

On March 13, 2001 St. Paul's Lutheran Church appeared before the Commission to support the Point Vicente Park Enhancement Alternative (Sec.7.9) and oppose the use of the City property for a golf course.

179G

We are very concerned about the impact of a golf course - driving range or holes - operating everyday, all day, so close to the church with noise from golfer's voices, golf carts moving about, maintenance activities, parking for 50 autos, "pro shop" operations, to name only the most obvious.

Equally important is our concern for errant golf balls dropping onto church property with the safety hazard that represents to our members and guests moving about the church property and parking lot.

With the proposed relocation of two holes of golf in the narrow hilly open space next to St. Paul's and Villa Capri, both properties are in line in some degree with the line of play - St. Paul's is only 20 degrees left of the new hole 3 tee at 200 yards.

179H

We believe that any kind of golf activity - driving range or holes - is totally incompatible with the functioning of the church. It is inconsistent with our worship services on Sundays; weddings, memorials and other worship services held on other days; and customary outdoor activities including summer day camps and Vacation Bible School, and occasional worship services.

By



Joseph J Picarelli  
30311 Via Borica  
Rancho Palos Verdes

**Les Evans, 08:28 AM 4/2/01 -0700, Fwd: Long Point and City Hall Property**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 02 Apr 2001 08:28:22 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point and City Hall Property  
X-MIME-Autoconverted: from quoted-printable to 8bit by faxmail.rpv.com id HAA06397

From: PinkhamD@aol.com  
Date: Wed, 28 Mar 2001 20:44:46 EST  
Subject: Long Point and City Hall Property  
To: CityCouncil@rpv.com  
X-Mailer: AOL 5.0 for Mac sub 40

To the Rancho Palos Verdes City Council Members

The retention of open space was a prime consideration prompting the formation of RPV. Development without regard to the environment or citizens desires is irresponsible and unacceptable. The Federal deed that transferred ownership of the City Hall property in 1979 was NOT intended to be used by a private developer that needed more land for his commercial golf course. It seems to many of us that SOC has presented many acceptable proposals that would allow the public better use and access to this beautiful land.

We think that Long Point should proceed with their already approved plans on their own property. As you know, there is already several golf courses near this property that guests could easily drive to. We think it is misleading to believe that the project will fail unless the city gives away our public land.

It is inconceivable that this city Council, Staff, and Parks Commission would allow this to happen. Decisions this important should be placed on this November's election. Let the people tell you what THEY want .

Sincerely,

Dan and Vicki Pinkham

We would like our comments included with the agenda package and part of the public record.

**180A**

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

1055 W. Seventh Street, Suite 2700, Los Angeles, CA 90017-2503

Tel: (213) 624-3044 Fax: (213) 624-8060

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 NEW YORK, NEW JERSEY

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 KYM G. BULLOCK  
 KRISTIN KUBEC  
 JOHN J. IMMORDINO  
 FRANK J. REGAN -  
 AUDREY FONG  
 CHRISTINA L. YOUNG  
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 ALICIA N. ZALES  
 SHAIGIN S. KIM  
 AIDE C. ONTIVEROS  
 SHARON O. SUNG  
 ELLEN J. SHIN  
 SHANEL K. YANG  
 JASON S. J. KIM  
 RONALD R. MILLSAP

- ALSO ADMITTED IN NEVADA

March 28, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
 City of Rancho Palos Verdes  
 30940 Hawthorne Blvd.  
 Rancho Palos Verdes, CA 90275

Re: The Long Point Resort

Dear Mayor, Members of the City Council and Planning Commission:

I am a resident of Rancho Palos Verdes. I am writing this letter to express my support for the Long Point Resort Project.

For many years I have driven past the old Marineland property. It is amazing to me how such a beautiful piece of property, once the pride of the Peninsula, could be allowed to deteriorate and sit unused for so long. The people of Palos Verdes deserve a world-class resort they can be proud of.

I understand that some people object to portions of the Resort being placed on public land. What is the point of having public land if it is not improved and opened up for the enjoyment of the community? I for one look forward to spending time with my family enjoying the new public trails, picnic areas and parkland. The Long Point Resort would offer so much for the community and make Palos Verdes the envy of every other City. Not only will new recreational facilities be built at developer expense, the property will continue to generate a windfall of tax revenue for years to come.

I urge you not to allow the Long Point property to languish any further. Let's not let this wonderful opportunity pass us by due to the objections of a few.

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN &amp; DICKER

  
 George A. Pisano

181A

Les Evans, 08:07 AM 3/12/01 -0800, Fwd: Point Vicente Alternate Plan

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 12 Mar 2001 08:07:39 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Point Vicente Alternate Plan

X-Originating-IP: [209.179.135.132]  
From: "Jan Porter" <momporter@hotmail.com>  
To: citycouncil@rpv.com  
Subject: Point Vicente Alternate Plan  
Date: Sat, 10 Mar 2001 18:36:16 -0000  
X-OriginalArrivalTime: 10 Mar 2001 18:36:17.0208 (UTC) FILETIME=[FE3BA380:01C0A990]

We are so disappointed that the city council is even considering giving public land to a private developer. Yes, the city may make money.

But what about the vast majority of people who do not play golf? What about the people who do not have the money or time necessary to play at such a site?

This land was set aside of the long term use by all of the people. This smacks of people in power helping moneyed people make more money.

A public park with a multitude of uses is more appropriate.

We certainly hope that you do not give away another piece of public land.

The Fourteen Homeowners on Mesaba Drive

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182A

RECEIVED

MAR 19 2001

cc  
Dore Snow

MAR 20 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 13, 2001

Mayor Lyon, Members of the City Council Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, California 90275

Re: The Long Point Resort

Dear Mayor, Members of the City Council Planning Commission

We are in favor of the Long Point Resort

The City can certainly use the revenue. The developer is definitely qualified. The plans have been well thought out. Palos Verdes needs a hotel and facilities. There are many more reasons why we feel this project should be approved.

We have been Palos Verdes residents for over forty years. We are proud of our city and where we live. We feel this facility can do nothing but improve the Peninsula.

Most sincerely,

*Charles Powell*  
*Marty Powell*

Charles and Marty Powell  
30047 Knoll View Drive  
Rancho Palos Verdes, Ca. 90275-6441

183A



**COMMENT NO. 184**

March 26, 2001

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes

Dear Mayor, Members of the City Council and  
Planning Commissioners:

**RE: The Long Point Resort**

I feel that the five new public parks and scenic viewpoints that will be included in the Long Point project are a real plus. So, are the new parking spaces for the public that will be added to the Fishing Access area, adjacent to the new bluff-top park, to be built by the developer. And there will be more general public parking added in the Resort hotel area.

All of us who like to hike, pedal or walk should get behind the Long Point Resort proposal. Just think -- eleven miles of new pedestrian and bicycle trails will be created as part of this project - all at the expense of the developer. Included is a new public trail located along the bluffs at Long Point that connects with other existing and new trails to the east and west. And, two public walkways from the bluffs to the shore will be improved - one of which will be accessible to those who are physically challenged.

The Long Point Resort has my support.

Regards,



Andrew Pride Jr., homeowner  
6542 Ocean Crest Dr. # C107  
Rancho Palos Verdes, CA 90275

184A

*Have Snow*

March 26, 2001

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes

**RECEIVED**

MAR 28 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mayor, Members of the City Council and  
Planning Commissioners:

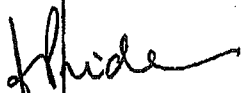
RE: The Long Point Resort

All of us who like to hike, pedal or walk should get behind the Long Point Resort proposal. Just think -- eleven miles of new pedestrian and bicycle trails will be created as part of this project - all at the expense of the developer. Included is a new public trail located along the bluffs at Long Point that connects with other existing and new trails to the east and west. And, two public walkways from the bluffs to the shore will be improved - one of which will be accessible to those who are physically challenged.

185A

The Long Point Resort has my support.

Regards,



Angela Pride, homeowner  
6542 Ocean Crest Dr. # C107  
Rancho Palos Verdes, CA 90275

SilVicQ@aol.com, 05:46 PM 3/8/01 -0500, York Proposal

---

From: SilVicQ@aol.com  
Date: Thu, 8 Mar 2001 17:46:51 EST  
Subject: York Proposal  
To: DavidS@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10505

Dave, please copy all Planning and Finance Committee Members.

There are 40,000 citizens in RPV who do not have a vote regarding the York Proposal for a golf course on City Hall property. A great preponderance of these folk who are opposed to this development can appeal to the Planning Commission and Finance Committee to be responsive to the community desire. It seems that the great majority of the public stand opposed to a few developers who "promise" huge revenue to the City that, obviously, is not a realistic amount. I cannot believe that a responsible governing body would even consider such a choice. At first the York proponents said that the project could not survive with less than an 18 hole golf course. Now they feel 9 holes will make the project a success. Of course the Long Point land will have "casitas" and town homes where golf holes were originally planned. This is a bad joke. We feel that York acquired the property with his eyes wide open and should build on his property exactly what was originally planned and approved by the City Council. Enough of this nonsense on the part of those York proponents. Lets hope the Committees and City Council do the right thing and disapprove this project.

Vic Quirarte  
29369 Quailwood Dr.  
RPV 90275

186A

VIC QUIRARTE  
29369 QUAILWOOD  
RANCHO PALOS VERDES 90275

COMMISSIONERS AND COMMITTEE PERSONS

40,000 RPV citizens have been held hostage for several years as developers put together their strategy to build a golf course on our land at Upper Point Vicente Park.

You folks, having been assigned to your positions by our City Council, are the caretakers of the residents needs and desires. In that sense you wield a lot of power, in some cases more than our City Council.

On behalf of our citizens, an overwhelming number of which do not want a golf course on public land, I ask that you listen to these arguments.

- The developer cannot lease or buy the land due to deed restrictions issued upon the City's acquisition. But, the Developer has stated he will provide concessions instead.
- The Developer has stated that the City would gain \$4.5 million annually from resort taxes. Nick Green wrote in the Daily Breeze a few weeks ago that the Del Amo Mall provided the city of Torrance \$4.3 million in calendar 1999. Keep in mind that thousands of customers visit the Mall weekly. The Resort couldn't possibly have that patronage, yet they are bold enough to say they can provide more to the city then Del Amo could to Torrance. Do you believe that?
- When Mr. York acquired the Long Point site he did so with full knowledge of what has been previously approved for construction there, an on site golf course, hotel, and amenities. Later he wanted more, an 18 hole regulation course that would encompass land around the Interpretive Center. When that avenue closed its door on him, he

187A

settled for 9 holes (which he wouldn't at first) partly on city owned land. Of course townhomes and "cassitas" would fill his property. Can you approve that?

187A

- The developer has indicated that there would be no harm done to the habitat and wildlife. This despite written and oral testimony to the contrary by the United States Fish and Wildlife, and the California Fish and Game and countless other civic and conservation organizations. I believe the Planning Dept. has documentation in this regard.

187B

- An excellent alternative for the site was provided by SOC 11. Their idea to enhance the Park with nature trails and other amenities is superior than a golf course in that it is for all our citizens. It could even become a venue for School excursions such as those at Abalone Cove and Forrestal.

187C

- The developer stated that no protective fencing would be needed. If you study golf courses, all courses built along major thoroughfares have fencing to protect autos and pedestrians from errant balls. A 40 foot fence along Palos Verdes Drive is a must and will be obstructive to views from homes and area around it. Do you want that?

187D

In conclusion, I could go on and on giving reasons why a golf course should not be built on Public land but I think you will find those yourselves. With the utmost respect for your positions I hope and you do not allow this "land grab" to occur. Most of us feel that Mr. York can build what is approved on his own property without disrupting the public interest. I think it is in all our interests to keep our City as beautiful as it is. To keep as much open space as possible, to feel good that we did everything we could to keep our coastline as pristine and as free of development as we can.

187E

Sincerely,



Submitted at DC  
MEETING of 3.13.01

Les Evans, 07:37 AM 3/26/01 -0800, Fwd: Long Point Proposal

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 26 Mar 2001 07:37:38 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Proposal

From: SilVicQ@aol.com  
Date: Sun, 25 Mar 2001 15:58:47 EST  
Subject: Long Point Proposal  
To: citycouncil@rpv.com  
X-Mailer: AOL 6.0 for Windows US sub 10505

A few weeks ago Nick Green reported in the Daily Breeze that in calendar year 1999 the Del Amo Fashion Square Shopping Center provided the City of Torrance 4.3 million dollars in sales tax revenue. Keep in mind that thousands of patrons visit the Mall weekly. In literature provided attendees of a function Destination Development Corp. provided some residents of RPV at the Catalina Room a hand out stated that the City of RPV would realize 4.5 million dollars of revenue per year. Can any reasonable person believe that the proposed resort will have more patronage than the Mall as their financial figures suggest? I think not. I also think that you folks are too wise to let Destination Development Corp. pull the wool over your eyes in term of financial gain to the City. We can't "wine and dine" people like they can as we, opponents, are "grass roots" folk. We support a development of Long Point but NOT on OUR property at City Hall. Opposition to giving away OUR property comes from all walks of life. At the recent Planning Commission Meeting not one of the proponents was able to give a substantial reason to have a golf course on Our property other than to give a cosmetic reason like "it's an eyesore". Just about every legitimate organization in RPV opposes the use of OUR land for a golf course. We hope you follow the request of your constituents and not allow this golf course to be built on City property.

Thank you,  
Vic Quirarte

silvicq@aol.com

188A

Mr. Victor M. Quirarte  
29369 Quailwood Dr.  
Rancho Palos, CA 90275-4926

RECEIVED

MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

DAVE,  
ENCLOSED IS A LETTER IN  
RESPONSE TO THE EIR REPORT  
ON THE LONG POINT DEVELOPMENT  
AND USE OF CITY PROPERTY.  
SINCE THIS IS IN ADVANCE OF  
THE DEAD LINE FOR RESPONSES  
I TRUST IT WILL BE CONSIDERED  
IN DISCUSSION OF THE EIR.

THANKS,



P.S. PLEASE PROVIDE COPIES TO  
PLANNING COMMISSION MEMBERS  
PRIOR TO THEIR MEETINGS.



ANY PROB OR QUESTIONS CALL ME  
377-3916

VIC QUIRARTE  
29369 QUAILWOOD DR.  
RANCHO PALOS VERDES, CA. 90275

RECEIVED

MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Sirs,

The following are my concerns regarding the Environmental Impact Report for the Long Point Project.

Section 5.1-4 Scenic views

The proposed golf hole 2 runs parallel to Palos Verdes Drive West and is situated in such a position that errant "t-shots" could very easily strike a pedestrian, bicyclist, or auto using the street. The only way to prevent city liability from damage or injury is to erect a 40 foot high fence that would protect anyone using the street. These fences are common at most all golf courses in the Southern California area. Erecting such a fence contradicts the developers statement that a fence is not needed. Such a fence would also create a view obstruction that is in conflict with the regulations of the City of Rancho Palos Verdes.

189A

Section 5.6 Hydrology

Golf courses require heavy watering to properly maintain, tees, fairways, and greens. In addition chemicals are needed to ward off invasive plants. This being the case where does the run off go? Obviously it cannot saturate the land beneath without having the possible effect of a slide occurring. Is it possible the run off will find its way to the Coast Guard Station and the Point Vicente Interpretive Center? Water run off mixed with chemicals have an adverse effect of CSS below the proposed golf course destroying

189B



various species of wildlife and plants. The California Coastal Commission should have a voice in mitigation efforts in this regard.

**189B**

Section 5.7-2 RVP General Plan

A major impact would occur if the proposed project plan for UPVA is allowed to change from Passive recreational use to Active recreational use. Land which is now open for public use would be closed to the general public during golf hours and, even then the public would be prohibited from fairways and other golfing areas. What is now available for all the public to use at no cost will be available only to a handful of golfers willing to pay exorbitant fees for nine holes of golf. Currently some hikes are led by Docents from Los Serenos De Point Vicente and the Palos Verdes Land Conservancy. Often individual hikers can be seen utilizing the trails on their own. This EIR contains Section 7.9, the Point Vicente Park Enhancement Alternative. That section underscores the passive recreational aspects for UPVA and maintains the integrity of the open space concept upon which the City of RVP incorporated. It is irresponsible for any organizations or developers to think otherwise. As a taxpaying citizen of Ranch Palos Verdes it is my prerogative to demand that this property remain passive recreational.

**189C**

**189D**

Section 5.8-3 Visitor Use

With the construction of a new 18 hole golf course at the waste dump on the peninsula, it is unlikely that Long Point will get the number of visitors they anticipate. A 9 hole course, mostly on City owned land is not needed.

**189E**

Section 5.10-2 Golf Safety

As stated previously, safety fence will have to be installed along Palos Verdes Drive to protect autos and pedestrians. A fence will also be needed to protect the homes at Villa Capri. These 40 foot fences are view obstructions which are in conflict with the City's View Restoration Program.

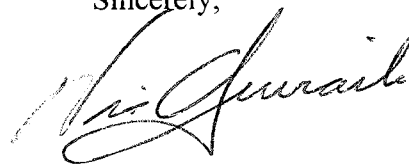
189F

In conclusion the above stated concerns are but a few of the many significant flaws in the design of the proposed golf course at Long Point. The DEIR seemed to be hastily prepared and biased toward the developer and consequently, not be considered a polished or completed project report.

189G

Lastly, it is incomprehensible that a developer would request public land to construct a golf course so that financial gain can be made by the owners. As one of 40,000 citizens of Rancho Palos Verdes I protest any approval that would allow such an injustice.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Gervais".

RECEIVED

MAR 23 2001

14 MARCH 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

LONG POINT DEVELOPMENT IN RPV - LET THE VOTERS DECIDE

I RECENTLY RECEIVED A BROCHURE FROM THE OWNERS AND "WANT-TO-BE" DEVELOPERS OF THE LONG POINT PROPERTY (MARINELAND) IN RPV. ONE OF THE KEY ISSUES OF THIS DEVELOPMENT IS THE USE OF CITY-OWNED LAND FOR PORTIONS OF THEIR GOLF COURSE. IN EXCHANGE FOR THIS USE OF CITY LAND, RPV WOULD SHARE IN CONCESSION REVENUE OF UP TO 50% (SO THE BROCHURE CLAIMS) OF THE CURRENT CITY BUDGET. FURTHERMORE, THE BROCHURE CLAIMS THAT MORE LAND WOULD BE OPEN TO THE PUBLIC VIA TRAILS AND MORE NATURAL HABITAT WOULD BECOME AVAILABLE AS PART OF THIS DEVELOPMENT. I SERIOUSLY DOUBT ALL OF THESE CLAIMS.

IN SEVERAL CITY COUNCIL MEETINGS, THE OVERWHELMING MAJORITY OF RESIDENT SPEAKERS ON THIS SUBJECT ARE OPPOSED TO THIS DEVELOPMENT BASED UPON ENVIRONMENTAL IMPACT. SOC II (SAVE OUR COASTLINE) HAS SUBMITTED AN ALTERNATE PLAN FOR A MORE "ENVIRONMENTAL FRIENDLY" USE OF THESE PUBLIC LANDS. I PERSONALLY AM OPPOSED TO THE USE OF CITY LANDS FOR THIS DEVELOPMENT AND ENDORSE THE SOC II PLAN. HOWEVER, I HAVE SEEN A COUPLE LETTERS WHICH MADE GOOD POINTS IN FAVOR OF THIS DEVELOPMENT.

I HAVE COME TO THE REALIZATION THAT MAYBE THIS ISSUE IS TOO IMPORTANT TO BE DECIDED BY JUST FIVE PEOPLE (THE CITY COUNCIL). TWO CITY COUNCIL SEATS WILL BE UP FOR ELECTION IN NOVEMBER. THIS WOULD BE AN EXCELLENT OPPORTUNITY FOR THE COUNCIL TO ALSO PLACE THIS ISSUE ON THE BALLOT FOR AN ADVISORY VOTE. AFTER ALL, THIS IS A DEMOCRACY AND RPV CONSISTS OF INTELLIGENT PEOPLE CAPABLE OF MAKING RATIONAL DECISIONS. LET THE DEVELOPERS PITCH THEIR SIDE, LET THE CITY TELL THE VOTERS HOW MUCH MONEY THEY WOULD REALISTICALLY EXPECT TO GET FROM THIS VENTURE AND WHAT THEY WOULD DO WITH IT (I.E., LOWER TAXES 50%, ACQUIRE MORE DEDICATED "NATURAL PRESERVES", ETC.), AND LET SOC II PRESENT ITS SIDE. THEN LET THE VOTERS CAST THEIR BALLOTS AND SEE WHAT THE MAJORITY IN THIS CITY REALLY WANT. THE COUNCIL LISTENING TO A FEW PEOPLE GET UP AND TALK AT COUNCIL MEETINGS DOES NOT GIVE A BROAD ENOUGH REPRESENTATION OF THE WILL OF THE PEOPLE IN THIS IMPORTANT ISSUE.

I WOULD HATE TO SEE THIS DEVELOPMENT APPROVED BY THE COUNCIL BY A 4 TO 1 VOTE WHEN I BELIEVE A LARGE MAJORITY OF OF THE RESIDENTS WANT TO LEAVE THE CITY-OWNED LAND IN ITS NATURAL STATE.

JIM RANDALL  
27415 LARCHBLUFF  
RANCHO PALOS VERDES



190A



3/22/01

MAR 27 2001

Southwestern Bell  
Yellow Pages

PACIFIC BELL  
Directory

Dear R.P.U. -

Please be advised  
that we strongly support  
the proposed Long Point  
Resort proposal.

We feel this is a  
responsible use of vacant  
land. One which will  
improve our view &  
bring needed TAX REVENUE.

thanks -

Steve  
Rankin

Steven F. Rankin  
4256 Admirable Drive  
Rancho Palos Verdes, CA 90275

Steve Rankin  
Director  
Customer Development

SBC Directory Operations, Inc.  
3470 Wilshire Boulevard, Room 630  
Los Angeles, California 90010  
Phone 213 351-4310

191A

Les Evans, 11:56 AM 3/27/01 -0800, Fwd: Upper Pt. Vicente

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 27 Mar 2001 11:56:56 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Upper Pt. Vicente

Date: Tue, 27 Mar 2001 09:18:59 -0800  
From: Anke Raue <ankeraue@home.com>  
X-Mailer: Mozilla 4.7 (Macintosh; I; PPC)  
X-Accept-Language: en,de  
To: CityCouncil@RPV.com  
Subject: Upper Pt. Vicente

Dear Counsil Members,  
in our opinion the best use of the public " Open Space" around City Hall  
is to acknowledge the need for playing fields and other public  
facilities on the flat parts around the City Hall. The bunker and  
anything downhill from there, east, south and west, should be preserve  
and restored as native habitat to protect not only the threatened birds,  
but also a piece of coastal sage scrub, so rapidly disappearing in  
California.

We are not sure wether this suggestion is in any of the 2 plans being  
considered by you, but should please the most people other than Mr.  
York. Please consider it seriously!

Thank you Jorg and Anke Raue, RPV.

192A

03-11-2001 09:34AM FROM SYDELLE RENNICK

TO

Sydelle Rennick Enterprises

03/10/01

Mayor Lyon  
 City Council of Planning Commission  
 City of R.P.V.  
 30940 Hawthorne Blvd  
 R.P.V., Ca. 90275

**RECEIVED**

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: The Long Point Resort

As a long time resident of R.P.V. I would like to express my support for this project. After Marine Land closed down, with no hope of re-establishing it again, the land has slowly deteriorated, which is such a shame. With this project, the public will still have access to the land & Cliff Side thru trails and parks. The land will be cared for and services available to us. Best of all, the City will have Income! We have not had that for years. I support the use of City land for the public Golf Course, (9 holes) which again will generate income for the City and establish new services for its residents.

Thank you,

Sydelle Rennick

193A

To: Dean Allison, Director of Public Works  
David Snow, Deputy Planning Director

**RECEIVED**

From: Paula Reuben, Traffic Committee Member

MAR 27 2001

Date: March 26, 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Subject: Long Point Resort - Draft Environmental Impact Report

The EIR for Long Point Resort acknowledges that at peak hours there are six intersections rated E (Operating conditions at or near the capacity level. All speeds are reduced to a low but relatively uniform value) or F (Forced or breakdown flow. This condition exists wherever the amount of traffic approaching a point exceeds the amount that can traverse the point.). Four of these intersections exist on Hawthorne Boulevard. Two intersections are in Torrance (Sepulveda Boulevard and Pacific Coast Highway); one in Rolling Hills Estates (Palos Verdes Drive North); and the fourth (Silver Spur) appears to be divided between Rolling Hills Estates and Rancho Palos Verdes. The fifth and sixth are at Western Avenue at 25th Street and Palos Verdes Drive. At this point, my concerns are with the Hawthorne Boulevard corridor.

**194A**

The EIR does not state how most of the traffic will arrive at Long Point. Whether the people come from the airport, the San Diego or Harbor Freeways, they will probably end up traveling south on Hawthorne Boulevard whether they enter Hawthorne on Pacific Coast Highway, Palos Verdes Drive North, Silver Spur or some other access street. Although some may drive through Palos Verdes Drives North, South and West to reach the resort, that way is scenic but slow; Hawthorne is the most likely route.

1. On page 21 of Section 15.12 (Traffic Impact Analysis) the report states that the level of service calculations were made during AM and PM peak hour counts in May, July and August 1999. Regarding the corner of Silver Spur and Hawthorne Boulevard:

- a. Peninsula High School was not in session during two of those three periods.
- b. Opening and closing times during the school year create their own peak hours at that intersection.
- c. Weekend traffic is heavy at various times because of sporting events at

**194B**

the high school, trips to the shopping center and the Sunday farmer's market.

194C

2. The EIR does not appear to address potential traffic problems during the construction phase, ie, if the construction equipment travels to and from the Long Point site via Hawthorne Boulevard, how will this impact the already congested intersections?

3. On page 29 of Section 15.12 (Traffic Impact Analysis), Table 3 addresses the Project Trip Generation, indicating that the hotel/meeting facility, casitas, villas, retail facilities, restaurants, spa and fitness center, golf course and driving range would generate 6, 263 trips daily, which it breaks down into between 55 - 70% internal hotel use and between 30 - 45% outside community use, depending on the facility being used; this information is based on marketing information provided by the project team. It is not clear whether the 6,263 number refers to the trips that patrons (the only people mentioned) would make or whether it includes the employees -- chambermaids, gardeners, front desk staff, dining room and kitchen help and others-- as well. If employees are not included, then the number of trips grows -- even if some of them take public transportation.

194D

4. Although the Long Point Resort will be in Rancho Palos Verdes, it appears that other cities, especially Rolling Hills Estates and Torrance, will be affected by traffic. Will they also be consulted?

194E

5. Finally, it is difficult to reconcile the recommendations for restriping Silver Spur Road (Section 15.12, p. 13) with the existing format (Section 15.12, p. 18) unless student parking is eliminated on both sides of Silver Spur both north and south of Hawthorne. They cannot park on Hawthorne east of Silver Spur, surrounding neighborhood streets or in the shopping center lot. The school does not have enough spaces. Where are they to go?

194F



MMGATROSS@aol.com, 12:03 PM 2/16/01 -0500, Land Acquisition

---

From: MMGATROSS@aol.com  
Date: Fri, 16 Feb 2001 12:03:44 EST  
Subject: Land Acquisition  
To: CityCouncil@rpv.com  
X-Mailer: 6.0 sub 352

Dear Council Members,

I am writing to let you know that I beleive it is a wonderful opportunity to purchase this land known as" Parcel 4" Item 12 on the 2/20 agenda. I am one of the silent ones, I didn't write an article for the PV News, but I too feel open space is critical to our community and well-being. I whole heartedly support the purchase of this land.

**195A**

Since I am also concerned about the City Hall site being used for development of a golf course I would like to make it known that I am not in favor of developing this particular site, especially for a golf course. We have very little in the way of places for our youth to get together and I would prefer(if we need to develop this area) that we consider something for our teens. There are no miniature golf course, no bowling alley, no billiards, table tennis areas and so on. We could use more tennis or basketball courts as well.

**195B**

Just my opinions which I am pleased to be able to e-mail. What a great idea!

Thank you all for the work and time you do for RPV residents!

Sincerely,  
Mary Ross

Les Evans, 03:53 PM 4/6/01 -0700, Fwd: Longpoint site: SOFTBALL FIELDS

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Fri, 06 Apr 2001 15:53:29 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Longpoint site: SOFTBALL FIELDS  
X-MIME-Autoconverted: from quoted-printable to 8bit by faxmail.rpv.com id OAA09139

From: LUVABCBS@aol.com  
Date: Fri, 6 Apr 2001 18:14:13 EDT  
Subject: Longpoint site: SOFTBALL FIELDS  
To: CityCouncil@rpv.com  
X-Mailer: AOL 5.0 for Mac sub 29

April 1, 2001

Planning Commissioners  
City of Rancho Palos Verdes  
Dept. of Planning, Building, & Code Enforcement  
30940 Hawthorne Blvd.  
R.P.V., CA 90275

Ron Rothstein M.D.  
Kari Chamberlain  
1728 Via Boronada  
Palos Verdes Estates, CA 90274-1860  
(310)378-6899hm

We are writing this letter in support of the the new fields which are being considered for the Palos Verdes Peninsula Girls Softball League (PVPGSL) at the Longpoint property site.

Our 13 year old daughter Ashleigh has been participating in the league for the past four years and has truly benefited from being a part of a growing group. The league has been restricted by playing on the undersized fields at Cornerstone; it needs permanent regulation size fields where the girls will be welcome.

This location would truly benefit my daughter's group and give the families a place to gather and support the girls. We urge you to consider it.

Thank you,

Ronald Rothstein M.D.

196A

Kari Chamberlain

**Howard and Marilyn Russell**  
81 Hilltop Circle  
Rancho Palos Verdes, CA 90275

March 8, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: The Long Point Resort

Dear Mayor, Members of the City Council and Planning Commissioners

Marilyn and I have been residents of Rancho Palos Verdes for 39 years, and have seen many changes. **The proposed Long Point Resort is the best thing to come along in many years.**

1. We need a hotel with meeting, convention facilities, and fine dining on the hill.
2. The trails and public access to the ocean will be a fine addition to the recreational facilities now available to our residents. As an avid hiker/trekker, I will welcome the chance to use the new trails.
3. I am a sometimes golfer and would certainly like to have more opportunity to play locally. Hours for non-members at some of the Peninsula courses are restricted, as you know, and also quite expensive.
4. We are also impressed with the fact that more acreage will be conserved and enhanced for native plant and wildlife habitat.
5. And as for the dog-in-the-manger attitude I read in some of the letters to the editor regarding the use of some public land for part of the golf course, don't those dim bulbs realize that the developer is dedicating a lot of his private land for public use? It's one of the best trades you could make!!! And besides, much of the public land in question is not well used now, for anything - not for recreation, not for habitat.

**Let's get on with the improvements.** Trading beauty, enhanced recreation and habitat for useless eyesores should be a no-brainer. Please say NO! to the naysayers, and YES to the very capable Long Point doers.

Sincerely,

*Howard & Marilyn Russell*

Howard & Marilyn Russell

197A

**Miro J Satalich, 06:07 PM 3/14/01 -0600, The Long Point Project and City owned property**

---

To: planning@rpv.com  
 Date: Wed, 14 Mar 2001 18:07:24 -0600  
 Subject: The Long Point Project and City owned property  
 X-Mailer: Juno 5.0.27  
 From: Miro J Satalich <jnsatalich@juno.com>

March 14, 2001

City of Rancho Palos Verdes  
 30940 Hawthorne Blvd.  
 Rancho Palos Verdes  
 California 90275

Please send to each Commissioner

Dear Planning Commission:

Commissioners; Frank Lyon, Chairman, Jon Cartwright, Larry Clark, Thomas Long, Craig Mueller, Theodore Paulson and Don Vannorsdall.

As lifetime area and twenty-seven year residents of Miraleste, knowing the instability of our local coastal area, during our time as children beginning with Pt. Fermin, and previous to that, noted slide areas of our entire peninsula per geological surveys 1921/35. More recently a map from the U.S. Geological Survey, indicating a specific fault line running along the southern edge of RPV City Hall and cutting through Long Point. We urge you not accept, instead; reject the Long Point proposal. The turning over. . . what little city-owned land. . . for private use, as well as profit. . . dishonors the spirit of the agreement in which the City of Rancho Palos Verdes accepted said property from the federal government.

**198A**

The Long Point developers bought their land with the clear purpose and intent of a resort hotel and a nine (9) hole golf course. The Palos Verdes Peninsula presently has five golf courses. Another one is simply not needed.

**198B**

We further urge, the City Council and Planning Commission work with SOC II, and/or other citizens who recommend retaining the few remaining unspoiled acres under City ownership.

The City of Rancho Palos Verdes was founded on the principal of local control over open spaces for all residents. Long Point, is a private enterprise, for a select group of people, for a fee.

After Long Point what other land is left?  
 Respectfully,

Jack & Nina Satalich  
 4125 Lorraine Road  
 Rancho Palos Verdes  
 California 90275  
 (310) 514-3013

Alfred Sattler  
1904 Avenida Aprenda  
Rancho Palos Verdes, CA 90275

Planning Commission  
City of Rancho Palos Verdes

My Personal Comments on Draft Environmental Impact Statement for Proposed Long Point Resort Development:

There definitely should be an alternative which combines the "No Project" alternative and the Point Vicente Park Enhancement alternative. The Point Vicente Park Enhancement alternative is clearly environmentally preferred compared to the project the applicant is proposing for the Upper Point Vicente Area.

There is one section entitled "Conservation District." It is a gross misuse of language to say that existing habitat areas in the Upper Point Vicente Area would be "conserved, enhanced, and created." Instead they would be fragmented, dismembered, and destroyed. Tearing up existing high-quality coastal sage scrub habitat to install lawn for a golf course would greatly diminish the habitat value. Narrow fringes of natural coastal sage scrub between sections of golf course would have little habitat value for wildlife. It would be inevitable for golfers to be trampling through the natural areas in search of wayward golf balls, further thrashing the plants and disturbing the animals.

If Long Point is presently an eyesore, it is the owner who is to blame. There have been development permits since 1989 for this area, and nothing has happened. The Long Point Resort could have been built years ago.



Alfred Sattler

199A

RECEIVED

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

**COMMENT NO. 200**

## **FAX COVER SHEET**

**From:** Barbara Sattler  
1904 Avenida Aprenda  
Rancho Palos Verdes, CA 90275  
(310) 831-0032

March 14, 2001

**To:** Mr. Joel Rojas, Director  
Planning Commission  
City of Rancho Palos Verdes

**Number of Pages:** 2 (including cover sheet)

**Subject:** Written copy of statement delivered to Planning Commission on March 13, 2001.

To the Rancho Palos Verdes Planning Commission:

March 13, 2001

**Comments on the Long Point Draft EIR**

1. The Biological Resources section of this DEIR refers to several focused surveys that have been done. The complete detailed reports of these surveys should be available in the Appendix. How hard did they look for the Special Status Species that were "not found"? Did they perform the surveys at an appropriate time? (Several of the plant surveys seem to have taken place in August or September which is the least likely time to be able to identify dormant plants.)

**200A**

The conclusion of "less than significant" impact in this DEIR often seems to be based on the existence of other populations of a species in remote locations. The reasoning seems to be that it is "ok" to severely impact a local species as long as there are still other members of the species remaining elsewhere. While this may be legally applicable for the Developer's own property, it is totally unacceptable for Public Land! We want to keep our unique diversity of species! Furthermore, this proposal is not the only proposal for development in Southern California. The cumulative effect of multiple developments would be devastating to many species.

**200B**

Some conclusions of "less than significant" impact in this DEIR seem to be based on promises of mitigation based on the LPHCP. However, the LPHCP mentioned in this proposal has not been presented to the public; is not a part of the DEIR; and has not been approved as a habitat protection plan. Therefore no satisfactory mitigation should be assumed based on that plan.

**200C**

2. It has been said before, but it bears repeating. The developer has no business proposing a project on Upper Point Vicente land that has been deeded to the Public. A golf course on that property would be in conflict with the City's General Plan. This land is zoned for Passive recreation and the zoning should not be changed. The public clearly wants to keep this land as natural open space.

3. The developer can aim for a "high quality golf experience" on his own property. We would like to keep our High Quality Nature and Wildlife Experience on Our Property.

**200D**

We would like to keep the delightful surprises of coming upon a Gnatcatcher or a Mariposa Lily. We would like to keep the ability to enjoy the tranquility and the incredible natural beauty of our unique native ecosystems without the intrusion of a commercial enterprise. We would like to keep our spectacular natural vistas without the clash of artificial landscaping and turf.

We would like to continue to enjoy all the views that are currently available to us.

We would like to keep the calm quiet that lets us hear bird songs.

We would like to keep the ability to meander down a path without having to assume a risk of being hit by an errant golf ball.

There is an interesting quote in the Appendix of this DEIR referring to golf safety: "A golf course, for example, is not a safe or appropriate place for a nature walk while play is in progress." (From "Golf Course Development in Real Estate")

**200E**

Barbara Sattler  
1904 Avenida Aprenda, R.P.V.



Al Sattler, 03:49 PM 4/6/01 -0700, Comments LPDEIR

---

Date: Fri, 06 Apr 2001 15:49:31 -0700  
From: Al Sattler <alsattler@igc.org>  
X-Mailer: Mozilla 4.75 [en]C-CCK-MCD NSCPCD47 (Win98; U)  
X-Accept-Language: en  
To: Al Sattler <alsattler@igc.org>, DavidS@rpv.com  
Subject: Comments LPDEIR

Barbara Sattler  
1904 Avenida Aprenda  
Rancho Palos Verdes, CA 90275

April 6, 2001

Mr. David Snow  
Planning Department  
City of Rancho Palos Verdes

re: Draft Environmental Report for the Long Point Resort Project

Dear Mr. Snow:

I have several concerns regarding section 5.8 Marine Resources in the LPDEIR.

Our marine habitat areas are especially precious. The local coastline in Fisherman's Cove and along Long Point is protected under a Rancho Palos Verdes Marine Life Preserve ordinance. The shoreline between Inspiration Point and 0.5 miles northwest of Portuguese Point is protected as the Abalone Cove Ecological Reserve, and listed as Marine Protected Area Site 71. For this reason, I believe we must be especially vigilant in ensuring that they remain protected. As detailed in this DEIR, potential impacts could be extremely negative and significant (p. 5.8-21, and 5.8-31 to 5.8-40).

**201A**

Although the LPDEIR suggests various plans as mitigation for potential adverse impacts to our marine resources, unfortunately these plans are not included for evaluation in this DEIR. The Runoff Management Plan/Water Quality Management Plan is referred to repeatedly, but it is not clear what the entire plan is. The DEIR proposes that a Stormwater Pollution Prevention Plan (SWPPP); a Best Management Practices plan (BMP); a Construction Erosion Control Plan; and an Erosion Control Plan be prepared/implemented prior to Grading Permit issuance. These plans should really be prepared and detailed for evaluation in this DEIR before this project is even approved.

I also have some questions about the storm drains. How would the large drain pipes and impact silling basins affect the aesthetic quality of the beach sites? Will there be problems with pooling of polluted water at these sites which could impact both human health and safety as well as marine life?

**201B**

**201C**

**201D**

Regarding the Upper Point Vicente area, this DEIR's conclusion that there would be no change in the hydrological characteristics if a golf course is installed there does not seem logical.

The DEIR suggests a 5 year monitoring period for the Marine Resources. I am not sure if this would be long enough, or if quarterly monitoring would be adequate.

Thank you for your attention to these concerns.

Sincerely,

Barbara Sattler



Marine1.wpd

Les Evans, 11:42 AM 4/5/01 -0700, Fwd: The Long Point Resort

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X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Thu, 05 Apr 2001 11:42:57 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

Reply-To: <Ken@KappaEngineers.com>  
From: "Ken Saunders" <Ken@KappaEngineers.com>  
To: <CityCouncil@rpv.com>  
Subject: The Long Point Resort  
Date: Wed, 4 Apr 2001 18:32:12 -0700  
X-Mailer: Microsoft Outlook IMO, Build 9.0.2416 (9.0.2911.0)  
Importance: Normal  
X-MS-TNEF-Correlator:  
<LPBBJLHPBECNOOKNOMBGAFLCFAA.Ken@KappaEngineers.com>  
X-Loop-Detect: 1

Dear Mayor, Members of the City Council and Planning Commissioners:

It is our greatest hope that as you consider the Long Point Resort proposal, you will find a way to approve this great project and to include a softball facility for the Palos Verdes Peninsula Girls Softball League. We have three daughters that play softball in this league. The facilities at Cornerstone Elementary have served well, but are by no means complimentary to the community. The new four diamond facility that is proposed at the Long Point Resort would give the girls today, and for many years to come, a place that they can be proud to call their own, a place that compares to what the Little League (boys) teams have, and a place that the community can be proud of.

The proposed development by itself sounds like a fabulous opportunity for the city. The current Long Point area is an eye sore at best and not representative of a city such as Rancho Palos Verdes. To acquire such an improvement to the area is an opportunity that should not be passed up. The tax revenues that result and employment it will add are a bonus. This proposal, if it is approved and built, can only add to the prestige and value of the entire Palos Verdes Peninsula in general and Rancho Palos Verdes in particular.

As much as we would like to see facilities that our entire family can enjoy such as restaurants, golfing and hiking trails, the real attraction is the girls softball facility. The league, the volunteers who make it happen, and the girls that play their hearts out every week all deserve the type of facility that is proposed. The community also deserves a facility that they will allow them to say "this is what we want for our children."

Thank you for your consideration of this matter.

**202A**

Ken and Seta Saunders



winmail1.dat

April 2,  
2001

Dear Mayor,

My name is Monica Saunders and I play on the Mets softball team. I really like softball because it is a healthy sport. I like running, and exercising, that's why I like softball so much.

My favorite part of softball is batting, running the bases, and sliding. I like batting because I like to hit the ball, I like running the bases because I like to run, and I don't know why I like to slide, but I just like to do it.

I think we should have a new softball field because some teams hit the ball far; I've seen kids hit the ball into other fields. I hope you can find a way you can build the new fields for us to enjoy. Also for girls on teams for many years to come.

Thank you.

Monica Saunders

4<sup>th</sup> Grade, Silver Spur

203A

RE: THE LONG POINT RESORT

NO. 5- 601

april 3  
2001

Dear Mayor,

My name is Stephanie  
Saunders and I play on  
the Marlins. I like softball  
because its a lot of  
exercise and it is a  
healthy sport. I also like  
softball because it  
is a fun sport.

I think you should  
build another softball  
field because if you  
do more teams can  
play all at one  
time.

And also more games  
can get done quicker.

204A

Stephanie  
Saunders

APR -5 2001

April 29, 2001

Mayor Lyon  
Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
RPV, CA 90275

RE: Long Point Resort

Dear Mayor, Members of the City Council and Planning Commission:

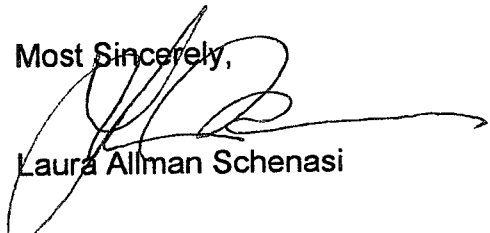
We have been an active family in the Peninsula since the 1960's. My family helped to build the Palos Verdes Little League field and we hand carried the rocks out of the adobe where the Senior League field was built in the early 70's. I have seen the importance youth sports have on children and yet we need more developed space for the future.

I urge you to approve the Long Point Development. I also urge you to include the development of a softball complex on the Lower Point Vincente property in the approval process. Girl's softball has specific field dimensions that are near impossible to accommodate in our mature community.

The lower Point Vincente property has the available flat area. The Long Point Resort developers will contribute to the development of a softball complex. Please approve the Long Point Resort development such that our community is able to expand recreational facilities for our children.

Thank you for your urgent attention and consideration of our request.

Most Sincerely,

  
Laura Allman Schenasi

205A

John and Vicki Schoenfeld

COMMENT NO. 206

93 Laurel Drive, Rancho Palos Verdes, California 90275

310-544-0888, Fax 310-377-9724

**RECEIVED**

MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 9, 2001

Planning Commission  
CITY OF RANCHO PALOS VERDES  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Re: Long Point Resort

Dear Commissioners:

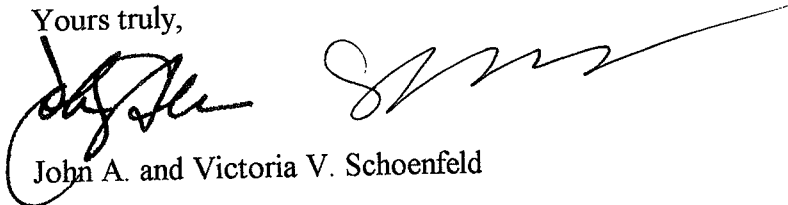
This shall confirm our support of the Long Point project and welcome its addition to our community.

We look forward to seeing green where now there is asphalt, to enjoying the extensive system of trails that will be provided and, of course, to the amenities that our community has long been lacking. As to purported negatives, we understand that its current plan significantly increases the natural habitat area over what currently exists and that there will be less traffic to the resort than there was when the property was operated as Marineland – certainly no negatives there.

While admittedly not necessarily altruistic, the millions of dollars the resort's operation will add to City coffers is certainly a plus!

To restate, we wholeheartedly support the Long Point Resort project.

Yours truly,



John A. and Victoria V. Schoenfeld

206A



Les Evans, 07:40 AM 3/8/01 -0800, Fwd: Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Thu, 08 Mar 2001 07:40:18 -0800  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Resort

From: MJSELS@aol.com  
Date: Thu, 8 Mar 2001 00:31:11 EST  
Subject: Long Point Resort  
To: CityCouncil@rpv.com  
X-Mailer: AOL 4.0 for Windows 95 sub 120

Mayor Lyon, Members of City Council and Planning Committee  
City of Rancho Palos Verdes

Dear Mayor, Members of the City Council and Planning Commission

Re: LONG POINT RESORT

As a 34 resident of the Peninsula, of which 32 of those have been in Rancho Palos Verdes, I am writing to you to let you know that I support the Long Point Resort Project 100%.

We have put up far too long with the blight on the old Marineland site. It is time to move on. The Palos Verdes Peninsula is one of the most beautiful areas in the entire world. A world class destination hotel will only enhance our wonderful community.

The property in its present condition offers nothing to our community, except for private parties held in the Catalina Room. With a beautiful resort hotel and all the added amenities it will offer, the City of Rancho Palos Verdes will profit, but more important we the citizens of the Peninsula will benefit.

Although I am not a golfer, I would like to see you approve an 18 hole golf course. I would also like to see a nicer City Hall, which I understand York would build. The Rancho Palos Verdes City Hall barracks need to go! The other four cities on the Peninsula have city halls they can be proud of, and that fit into our beautiful setting. Why can't Ranch Palos Verdes do the same?

I urge you to vote your approval for the Long Point Resort plans, and let's get on with it while most of us can take advantage of it.

Sincerely,  
Mary Jane Schoenheider  
3700 Palos Verdes Drive North  
Palos Verdes Estates, CA 90274

207A

PRESENTATION BEFORE RPV PLANNING COMMISSION – MARCH  
13, 2001

I wish to concentrate on the golf holes that are designed for the Upper Pt. Vicente site. These are holes 2,3,4, and 5. The original proposal has been reviewed for safety by Kipp Schulties of Kipp Schulties Golf Design, Inc.

Mr. Schulties points out that although no absolute standards exist for golf hole design, certain accepted standards are generally used. **The Destination Resort design adheres to standards that were used in the 1960s and 1970s.** Because of marked improvement in golf equipment, these standards are now considered inadequate for **safe** golf course design.

208A

Hole #2 needs the tees moved to the left (to direct balls away from PV Drive South) and a sand trap moved closer to the green (again to protect cars on PV Drive South).

Hole #3 and hole # 4, which run parallel to each other, are where some serious safety problems occur. #3, a par five, travels up a steep incline so that the golfer's second shot is blind (which means they can't see the green). The consultant offers two solutions: 1- make the hole a par four or 2. move the green 150-175 feet to the right. This option causes the 4<sup>th</sup> hole to be reduced to a 3 Par.

I now quote from Mr. Schulties' letter "Now, I realize that it is likely the developer will not be favorable to either of these options and I can sympathize with him/her. The golf course, as it is routed, is struggling to maintain its legitimacy as a regulation nine-hole golf course and not an **executive course**. However, he/she must understand that there is more long-term liability with injury to pedestrians and other golfers if you build the course as it has been routed."

208B

The consultant suggests cutting much of the landing area out on hole #3 (as **much as 15 feet lower**) to improve sight lines. I further quote "where to put all earth from the "cut" we discussed? Better let your golf course architect decide that one." It seems that hole #3 will become a long alley with a high berm on each side.

Submitted at P.C. meeting:  
3.13.01

I quote further "The second landing area on the 3<sup>rd</sup> hole and the landing area on the 4<sup>th</sup> hole are directly across from each other. Golfers on the right side of the third fairway may be in danger from shots off the fourth tees."

He also recommends shortening the 5<sup>th</sup> hole and placing dense vegetation and sand traps on the right to protect pedestrians using paths behind the green.

Quoting further "One clear negative about this overall routing (besides moving the range), is the amount of distance between the green complex and the following tee on many holes. **The amount of walking/riding time between green and tee is really going to have an impact on the pace of flow (and ultimately on the amount of players that can use the course).**"

Also, there are two re-designs of the golf holes on UPVA with the "no villas, alternate B option. One design places five holes on the UPVA and the second variation places 6 in the same space. There is very little comment on these alternatives. Therefore, we are not fully aware of the safety considerations for these options.

**In conclusion, it appears that the developer is trying to "shoehorn" 4, 5, or 6 holes of a regulation nine-hole golf course into inadequate space when safety factors are considered. He really has an Executive course, even taking the public land. This inadequate course will not be the attractant that the developer desires. I recommend that he re-think what amenities will really draw potential customers to the resort. If he does decide that he must have a course, then the Executive course can be developed on the Hotel Resort Area as he already has permission to do under the Monaghan Plan.**

**Ann Shaw**

208B

208C

208D

anndshaw@aol.com, 10:43 AM 3/30/01 -0800, Your comments were submitted to Rancho Palos Verdes

From: anndshaw@aol.com  
 Date: Fri, 30 Mar 2001 10:43:10 -0800  
 Subject: Your comments were submitted to Rancho Palos Verdes City Hall.  
 To: planning@rpv.com

=====  
 Confirmation of Your Service Request, Inquiry or Comment  
 =====

The following Information was submitted to Rancho Palos Verdes City Hall:

=====  
 Your Information  
 =====

Name:  
     Ann Shaw  
 Address:  
     30036 Via Borica  
 City:  
     RPV  
 Home Phone Number:  
     544-9916  
 Office/Other Phone Number:

E-mail Address:  
     anndshaw@aol.com

=====  
 Contact Instructions  
 =====

Where we can contact you should questions arise:  
     Home  
 Should we inform you of the action taken?:  
     Yes Contact me through e-mail

=====  
 Information about Your Service Request, Inquiry or Comment  
 =====

Location or Address of Service Request, Inquiry or Comment:  
     Comments on Long Point DEIR

Describe the Service Request, Inquiry or Comment:

These comments are directed to 7.10 of the DEIR Environmentally Superior Alternative. This states that the "No Project" alternative (meaning the Monaghan Plan) is the "environmentally superior" alternative among the other alternatives. The DEIR then states that the No Resort Villas-Option B Alternative would be considered the "second choice" environmentally superior Alternative.

209A

This conclusion boggles the mind. This second choice alternative places six golf holes on the upper Pt. Vicente site. It is clear that the No Development Alternative, The Program of Utilization Alternative and the Point Vicente Park Enhancement Alternative are all environmentally superior to any golf holes on the upper Pt. Vicente site.

When I read this section of the DEIR, I have to conclude that this is a biased document.

=====  
Thank You for your Comments.  
=====

We have received your email and thank you for taking time to contact us. If you have requested City staff to contact you, we will do so within 24 hours of receiving your message. The exact timing of our reply will depend on the nature of your email, as well as how you have asked us to reply. If you have additional questions or concerns, please feel free to contact us again. Your input and feedback is important to us and helps us to improve our service to the community.

209A

Copy to  
Councilmembers  
+  
David Snow

RECEIVED  
MAR -9 2001  
MAR 12 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

RE: The Long Point Resort

Dear Mayor, Members of the City Council and Planning Commissioners

What a fantastic opportunity for the City Of Rancho Palos Verdes.  
We can have handed to us a new destination type class hotel, developed recreational space, access to the ocean, hiking trails and more, not to mention \$4 to \$5 million of additional tax money with which we could buy even more open space, repair roads, underground utilities to name just a few uses.

I have supported the idea of a hotel being built on the Marineland site from the start but attending the community presentation on March 7<sup>th</sup> has made me VERY excited about the project being offered to the community. The developer has in my estimation looked at the project from all angles and come up with a winner.

I live on Via Rivera, not more than 2 miles form the main hotel site. Do I worry about traffic? No. We bought in 1975 when Marineland received approx. 1,000,000 visitors a year. We hardly noticed a difference when it closed. The Hotel will not experience nearly that kind of traffic.

My one concern, after Ocean Trails, was the geologic issue. That has been alleviated after reviewing the Environmental Impact Report.

In my opinion any rational thinking person could not help be in favor of a project that will conserve and enhance native habitat, allow access to the ocean, provide 11+ miles of hiking paths, clean up the old paved-over Marineland site, give us a public golf course AND practice facility, give us a destination resort hotel with restaurants and conference center while at the same time providing much needed tax money .

PLEASE do not let this opportunity slip away.

Sincerely



210A

Dear Mayor Lyon,  
Members of the City Council  
and Planning Commission,  
City of Rancho Palos Verdes.

Please help along that the Long Point Resort finally will get underway with being build. This project will be such an overwhelming gain to our City! Not only will it beautify, but it will bring much needed financial help. So, anybody with an eye for beauty and a sense for business should welcome this project. Too long have these bad looking and undeveloped acres of formerly Marineland been an eyesore for everybody, citizens and guests. We want to be proud of our City - and this will be a welcome addition. Please make it happen - soon!

211A

Thank you,  
Maria Spitz

30836 Via La Cresta  
R. P. V.

March 9, 2001

cc'd  
for cc  
& Snow

Mr. & Mrs. Gary Stahl  
51 Hidden Valley Road  
Rolling Hills Estates, CA. 90274

RECEIVED

APR 03 2001

April 1, 2001

Mayord Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.,  
Rancho Palos Verdes, CA. 90275

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mayor, Members of the City Council,

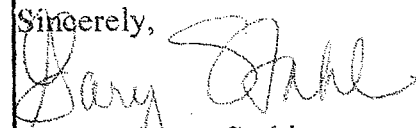
This letter is in reference to the Long Point Resort project and the potential opportunity to house a girl's softball complex as well as the wonderful resort. We are in full support of this project.

For years, the PVPGSL Board has been looking for designated places to house girl's sports. The scale, as you well know, is unbalanced when you compare designated city lands for boy's sports vs. girls.

This is the opportunity of a lifetime for the young girls on the Palos Verdes Peninsula.

Please support this project.

Sincerely,

  
Gary and Pam Stahl

212A



CC + David Snow

March 24, 2001

MAR 27 2001

Mayor Lyon, Members of the City Council and  
Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Mayor, Members of the City Council and  
Planning Commissioners:

Re: The Long Point Resort

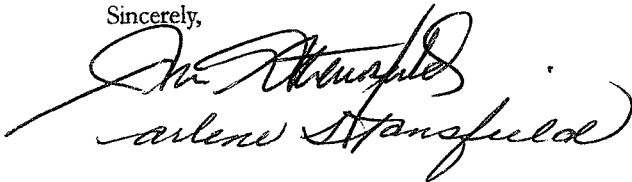
We are residents of Palos Verdes since 1961, and are in our 6<sup>th</sup> home on the peninsula. So we are very familiar with the community and are staunch supporters of the Long Point Resort..

We currently live in the Mira Verde Complex at the top of Hawthorne and can see this development as a huge advantage for the entire area.

- Marineland is an eyesore, and we should be ashamed to have subjected this blight on the landscape to the residents and scenic drive.
- The hillsides are "blah" and I can't imagine anything more beautiful than a rolling green of a golf course to improve the aesthetics of the area. We envision this as comparable to the drive through the Monterey area with its beautiful golf courses.
- An 18 hole golf course should have been approved in the first place to improve the landscape and the valuation of all properties in this area.
- Having facilities for dining, strolling, and events (weddings, etc.) are very limited in the South Bay and this would be a welcome improvement to the entire community.

Let us get on with this, and Mayor Lyon ... tear down those walls of obstruction and delays. We need this to proceed as quickly as possible so that we can all enjoy the fruits of this project.

Sincerely,



Arlene & Jim Stansfield

213A

Mr. and Mrs. Neil Stefanides  
30147 Avenida Esplendida  
Rancho Palos Verdes, CA  
90275  
March 12, 2001  
Re: Long Point Project

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Mayor, Members of the City Council and Planning Commision,

As twenty eight year residents of the Peninsula and observant residents of Rancho Palos Verdes since it's inception please be advised of our strong support for the Long Point Project. We respectfully urge the city to support the project as now proposed.

It is our considered opinion that the Long Point Project will be a valuable, enjoyable and economically attractive development that should be embraced for the additions and opportunities that would result from it's realization. The project would put to good use a valuable property that has been lying fallow since the closing of Marineland. Additionally the project has the potential to contribute to the city much needed revenues ranging from moderate to considerable sums compared to the cities current level of income. May I mention also one of the fundamental principles of our society which is that of property rights. To deny development of a well conceived addition to our community is just plain wrong unless and untill the city is ready to pay full price for the value of the property and then what? The attendant plan for some attractive developments on city property is an integral part of the total and is consistant with the original guidelines enumerated when that property was conveyed to the city. This portion of the plan would spare the city the cost of development and ongoing cost of maintenance while providing recreational benefits to the community, a clear win win.

214A

Approval of the Long Point Project is well deserved. It would serve the city well and we therefore urge the city to approve the project.

**214A**

Sincerely,

Original signed by Neil Stefanides

Neil and Nancy Stefanides

MAY 30 2001

Debby Stegura  
4706 Sugarhill Drive  
Rolling Hills Estates, California 90274

March 28, 2001

The Hon. Marilyn Lyon  
Members of City Council & Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, California 90275

Re: Long Point Resort

Dear Ms. Lyon and Members of the City Council & Planning Commission:

When I was 10 years old, my friends and I went to the local park and asked to join the girls' softball team. When they told us there was no team, we formed a team, which competed with other girls' teams in the L.A. City Parks & Recreation system. In those days, we had the fields, but not the teams.

Now, a generation later, my two daughters (ages 7 and 9) have the benefit of a well-developed girls' softball league, but do not have adequate fields. We are asking that Rancho Palos Verdes approve the use of some space at the Long Point Resort for the proposed softball complex.

My husband, Larry Vanden Bos, and I are parents of athletes, and actively participate in developing their skills. Our son (age 12) has played AYSO soccer for 6 years; my husband has coached him for all 6 years. Our daughters have each played AYSO since they were in kindergarten. Larry and I are both on the Board of Region 10 (Palos Verdes) AYSO. (Larry is Assistant Regional Commissioner of Region 10.) Our daughters have played softball in the PVPGSL for 3 years each; this is the third year that I have managed or co-managed my younger daughter's team. My husband manages our older daughter's team this year. In addition, I am a member of the PVPGSL Board.

It is difficult to develop good skills, however, without adequate facilities, whether soccer fields or softball diamonds. We urge the City of Rancho Palos Verdes to take advantage of the Long Point Resort developer's professed willingness to meet demand for adequate sports facilities on the Peninsula. The demand is there; let's step up to the plate.

Very truly yours,

*Debby Stegura*  
Debby Stegura

215A

**Long Point**

To: David Snow <davids@rpv.com>  
 Subject: LONG POINT EIR

In accordance with the instructions in Joel Rojas's February 9, 2001 letter I am sending you a recommended clarification to the subject  
**FEBRUARY 2, 2001, LONG POINT RESORT ENVIRONMENTAL IMPACT REPORT.**

Since the Long Point EIR has been issued I have heard people speculating that the vehicular traffic around the Developer's "Proposed" project will not be any greater than it was when Marineland was at it's prime - or than it would have been around the previously "Approved" Marineland site Hotel complex project.

I have not been able to locate in the EIR (CD) any data that permits me to examine this traffic speculation, so I am recommending the development of the data. My suggested presentation format follows:

NUMBER OF VEHICLES  
 IN A  
 (24 Hour Peak Period)

	Marineland Site	
	Previously	Current L.P.
Marineland	"Approved"	"Proposed"
In its Prime Today	Project	Project

**216A**

**EAST BOUND VEHICLES ON  
 PV DRIVE SOUTH**

Just before the Prop. entrance	_____	_____	_____	_____
Turning into the Property	_____	_____	_____	_____
Joining from the Property	_____	_____	_____	_____
Just after the Prop. entrance	_____	_____	_____	_____

**WEST BOUND VEHICLES ON  
 PV DRIVE SOUTH**

Just before the Prop. entrance	_____	_____	_____	_____
Turning into the Property	_____	_____	_____	_____
Joining from the Property	_____	_____	_____	_____
Just after the Prop. entrance	_____	_____	_____	_____

Please advise if you have any questions,

Regards,  
 Glen L. Steiger  
 29146 Oceanridge Drive  
 Rancho Palos Verdes, CA 90275  
 Phone: (310) 377-9713

**RECEIVED****MAR 07 2001**

**PLANNING, BUILDING,  
 & CODE ENFORCEMENT**

**Glen Steiger, 05:04 PM 3/10/01 -0800, LP PROJECT GRADING - CUT & FILL**

Date: Sat, 10 Mar 2001 17:04:18 -0800  
 From: Glen Steiger <gjsteiger@earthlink.net>  
 X-Mailer: Mozilla 4.72 [en] (Win98; U)  
 X-Accept-Language: en  
 To: David Snow <davids@rpv.com>  
 Subject: LP PROJECT GRADING - CUT & FILL

Dave,

I have examined the grading portion of the LP EIR and extracted the following data which created my questions:

DATA SOURCE	CUT	FILL	NET Cut	NET Fill
<b>A. Grade Project Areas</b>				
The Project area would be graded consistent with the Grading Plans for the two geographic areas within the Project..."				
EIR page 3-30				
RHA	432,000	410,000	22,000	0
UPVA	139,080	131,940	7,140	0
<b>TOTAL</b>			<b>29,140</b>	<b>0</b>

**B. Construction Impacts**

Cut and fill operations would be necessary for the grading of the hotel facilities golf course and other hotel-related developments."

Grading and Storm Drain Construction

EIR page 5.8-20

5.8.1	550,000	500,000	50,000	0	
<b>TOTAL</b>				<b>50,000</b>	<b>0</b>
<b>GRAND TOTAL</b>				<b>79,140</b>	<b>0</b>

**Questions:**

1. Why is the Project's cut and fill presented on two different pages in the EIR?

**217A**

2. Why isn't a total Project cut & fill summarized on one page in the EIR?

**217B**

3. Which is the correct representation of the Project's cut and fill - A. or B.?

**217C**

3. The cut and fill is stated as "Balanced" in A. No so in B.

What happens to the "Net Cut" in B.

**217D**

4. What will the cut and fill numbers be for A. & B. after mitigation?

**217E**

Thanks for your help,

Glen L. Steiger

29146 Oceanridge Drive

Rancho Palos Verdes, CA 90275

Glen Steiger, 01:56 PM 3/13/01 -0800, LONG POINT EIR "RECREATION"

---

Date: Tue, 13 Mar 2001 13:56:41 -0800  
From: Glen Steiger <gjsteiger@earthlink.net>  
X-Mailer: Mozilla 4.72 [en] (Win98; U)  
X-Accept-Language: en  
To: David Snow <davids@rpv.com>  
Subject: LONG POINT EIR "RECREATION"  
X-MIME-Autoconverted: from 8bit to quoted-printable by faxmail.rpv.com id OAA00295

Dave,

The Long Point EIR describes in some detail the proposed Project's system of public walkways, jogging paths, and bike trails linking public areas and amenities; plus passive recreation areas (i.e. lawns, scenic overlooks, and seating areas).

I was unable to determine from my CD what portion of each of these "recreation" items is located in the Project's RHA (Resort Hotel Area), what portion is located in the Project's UPVA (Upper Point Vicente Area) and a comparison of the Project's total with the currently approved Marineland project.

I recommend the preparation of a comparative representation (chart) as necessary so that an objective evaluation is based on all the facts.

Regards,

Glen L. Steiger  
29146 Oceanridge Drive  
Rancho Palos Verdes, CA 90275-4908

218A

218B

**Glen Steiger, 08:15 PM 3/29/01 -0800, NUMBER OF VEHICLES - MY MAR 7 EMAIL**

---

Date: Thu, 29 Mar 2001 20:15:11 -0800  
From: Glen Steiger <gjsteiger@earthlink.net>  
X-Mailer: Mozilla 4.72 [en] (Win98; U)  
X-Accept-Language: en  
To: David Snow <davids@rpv.com>  
Subject: NUMBER OF VEHICLES - MY MAR 7 EMAIL

Dave,

The EIR, under the Alternative 7.2 (Traffic & Circulation), says that the proposed Project has 6,363 average daily trips while Alternative 7.2 has 9,619 average daily trips. These numbers say that Alternative 7.2 has 53.6% more daily trips than the proposed Project. I say this is impossible - especially since Alternative 7.2 has fewer facilities to attract vehicles.

I will be most interested to see how the Consultant, when completing the chart for my Mar7 email, makes these numbers reasonable.

Glen Steiger

**219A**



Glen Steiger, 10:15 AM 4/4/01 -0700, ALTERNATIVE 7.2'S ASESMENT ERRORS

---

Date: Wed, 04 Apr 2001 10:15:40 -0700  
 From: Glen Steiger <gjsteiger@earthlink.net>  
 X-Mailer: Mozilla 4.72 [en] (Win98; U)  
 X-Accept-Language: en  
 To: David Snow <davids@rpv.com>  
 Subject: ALTERNATIVE 7.2'S ASESMENT ERRORS  
 X-MIME-Autoconverted: from 8bit to quoted-printable by faxmail.rpv.com id JAA07806

TO: RANCHO PALOS VERDES PLANNING COMMISSION  
 CC: RANCHO PALOS VERDES CITY COUNCIL

SUBJECT: ALTERNATIVE 7.2 "NO PROJECT" ASSESSMENT ERRORS

Alternative 7.2's is more appropriately identified as the "Approved Monaghan Resort at Marineland." While similar to the proposed Project, Alternative 7.2's major difference is that it does not use City property.

I submit that the EIR errored in two assessment areas of the subject Alternative: (1) Public Services & Utilities and (2) Traffic & Circulation.

There is no logical way to confirm that "intensive development" can be used as a justification for stating these Alternative 7.2 areas have a greater demand on the environment than the proposed Project.

Examples:

- A simply comparative listing shows that the proposed Project is more intensive - it has more buildings (i.e., 35 Resort Villas), more golf practice spaces (i.e., 30 Tee Stations), more Conference Center/Retail Facility area (i.e., 8,000 sq. ft) and at least 90 more parking spaces for the Villas and the Tee Stations than Alternative 7.2.
- To say that Alternative 7.2 requires more schools, water, electricity, gas and will generate more wastewater and solid waste is illogical and incomprehensible. (Think about it. The EIR doesn't say the proposed Project requires any schools.) There is no statement from either the Police or the Fire Department saying that Alternative 7.2 will require more of their services.
- To justify traffic being greater for Alternative 7.2 through the use of a figure 35% higher than the proposed Project shows questionable judgment, (no comment that the traffic numbers are so different between Alternative 7.2 and the proposed Project that a reconciling study is appropriate.) Again, logic says that if you have less of everything Alternative 7.2 must have less traffic.
- Similarity, Alternative 7.2 is stated to have 114% more employees than the proposed project. Since there is less facility in Alternative 7.2 it must require fewer employees.

Throughout the evaluation of these two assessment areas, with traffic and employees as outstanding examples, data appears to be lifted from Alternative 7.2's EIR and used without evaluation or comment.

Pending word to the contrary, I firmly believe this to be true and I implore the Commission to either require a complete new study or declare

220A

220B

these two areas of Alternative 7.2 have an overall impact less than the proposed Project.

**220B**

Glen L. Steiger  
29146 Oceanridge Drive  
Rancho Palos Verdes, CA 90275

Glen Steiger, 05:15 PM 4/5/01 -0700, LONG POINT - GOLF PRACTICE FACILITY EIR

---

Date: Thu, 05 Apr 2001 17:15:29 -0700  
From: Glen Steiger <gjsteiger@earthlink.net>  
X-Mailer: Mozilla 4.72 [en] (Win98; U)  
X-Accept-Language: en  
To: David Snow <davids@rpv.com>  
Subject: LONG POINT - GOLF PRACTICE FACILITY EIR

TO: RANCHO PALOS VERDES PLANNING COMMISSION  
SUBJECT: LONG POINT'S PUBLIC GOLF PRACTICE FACILITY

The Long Point EIR identifies the subject facilities in its Section 2.1 Project Summary. In the CD that I have I am not able to find a description and environmental analysis of the complete practice facility i.e. its structures - its parking facility for patrons and employees - its utility use - its traffic impact - its maintenance equipment requirements and a separate statement of its impact on the environment.

Since this facility appears to be self contained in an area remote from the Resort/Golf Area and not addressed completely therein, I recommend that a completed section in the EIR be developed for this 30 Tee Station practice facility.

Glen L. Steiger  
29146 Oceanridge Drive  
Rancho Palos Verdes, CA 90275

**221A**

**Glen Steiger, 11:44 AM 4/6/01 -0700, LONG POINT ACREAGE**

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Date: Fri, 06 Apr 2001 11:44:49 -0700  
From: Glen Steiger <gjsteiger@earthlink.net>  
X-Mailer: Mozilla 4.72 [en] (Win98; U)  
X-Accept-Language: en  
To: David Snow <davids@rpv.com>  
Subject: LONG POINT ACREAGE  
X-MIME-Autoconverted: from 8bit to quoted-printable by faxmail.rpv.com id KAA09038

Dave,

The EIR's Project Summary (page 2-1) lists this project's acreage as:

Conservation District	34.0
Recreation District	81.2
Resort Development District	55.6

for a total of 170.8 acres.

The EIR's Table 3-1 entitled Property Ownership (page 3-7) list this projects acreage as:

Resort Hotel Area	103.5
Upper Point Vicente Area	64.9

for a total of 168.4 Acres.

Question(s): Is there a typo re acreage quantity? Which one is correct?

Glen

**222A**

RECEIVED

APR 03 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

32215 Searaven Drive  
Rancho Palos Verdes,  
CA 90275  
April 1, 2001

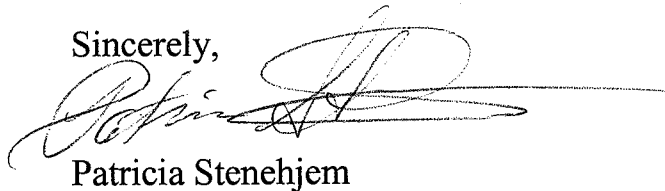
David Snow  
City of Rancho Palos Verdes  
Department of Planning, Building, and  
Code Enforcement  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275-5391

Dear Mr. Snow,

I am opposed to the Long Point Project using public land for any purpose; I prefer that the open space adjacent to City Hall be used by and for the public, and managed by environmental groups, such as the Land Conservancy.

223A

Sincerely,



Patricia Stenehjem

---

Les Evans, 08:41 AM 3/9/01 -0800, Fwd: Long Point EIR and Resource Agencies MArch 1 letter

X-Sender: LesE@207.238.114.197  
 X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
 Date: Fri, 09 Mar 2001 08:41:49 -0800  
 To: joelr@rpv.com  
 From: Les Evans <lese@rpv.com>  
 Subject: Fwd: Long Point EIR and Resource Agencies MArch 1 letter  
 Cc: davids@rpv.com

Joel:  
 Be sure the PC gets Doug's letter and the Resource Agency letter.  
 Les

From: "Doug Stern" <DouglasStern@hotmail.com>  
 To: "Joel Rojas" <joelr@rpv.com>, "Evans, Les" <lese@rpv.com>  
 Subject: Long Point EIR and Resource Agencies MArch 1 letter  
 Date: Thu, 8 Mar 2001 21:06:39 -0800

Douglas W. Stern  
 2731 Coral Ridge Road  
 Rancho Palos Verdes, California 90275

March 8, 2001

Re: Draft EIR re Long Point/City Hall Hotel & Golf Course Project

Joel,

As a member of the public I would request that the March 1, 2001, letter from the U.S. Fish and Wildlife Service and Dept of Fish and Game be provided to the Planning Commission along with this letter.

The March 1, 2001 letter points out the importance of the City Hall property environmentally and in the context of the NCCP. I believe it is important that the commissioners appreciate the significance of this information, and the importance of working with the landowner of Long Point to achieve a plan that removes those elements (villas, casitas, above ground parking) that use the Long Point site and "force" the need to use city owned property for the planned 9 hole golf course. The City Hall property should not be a part of this project.

As the March 1, 2001 letter notes:

224A

"We are particularly concerned with the proposed development within the large blocks of habitat primarily on City Hall property and in the moratorium . . ."

As previously discussed with you, we are concerned with the existing proposals for the York/Long Point and Hon Company projects. The York/Long Point (Destination Resorts) development continues to propose development on the former Marineland site, City Hall, and National Park Service properties, and would impact a highly productive area for the federally threatened costal California gnatcatcher."

\* \* \*

We understand that a previously approved project has obtained land use approvals from the City [the Monahan hotel and golf course located only on Long Point] that are necessary to develop the former Marineland site. The Wildlife Agencies maintain that development of the proposed project on the Marineland site would be consistent with NCCP.

224A

However, the project by York/Long Point proposes to develop a resort hotel, 9-hole golf course, and associated amenities on the former Marineland site, exiting public lands owned by the City, and public lands acquired by the National Park Service with Federal Land and Water Conservation funds. We maintain that their proposal will significantly reduce productive gnatcatcher habitat, particularly on the City Hall land. Though the City has indicated that sage scrub would remain or be revegetated on the property, these areas would become further fragmented by the proposed development. The sage scrub habitat would not be contiguous, would be a patchwork of lands surrounding the proposed fairways within the golf course, and unlikely be able to maintain a productive gnatcatcher area. Public lands that support sensitive habitat and species should be considered a priority for being placed into the reserve to maximize conservation benefits and minimize acquisition costs of the NCCP plan. Additionally, the partial loss or fragmentation of City Hall land would compromise the linkage of

the 30-acre mitigation site on Subregion 1 and the Agua Amarga Canyon, another productive gnatcatcher habitat area on the peninsula."

**224A**

Thank you.

Douglas Stern



# Jefferies & Company, Inc.

11100 Santa Monica Boulevard, 10th Floor, Los Angeles, California 90025  
Telephone (310) 575-5200 (800) 933-6656 Fax (310) 575-5165

CORPORATE FINANCE

March 12, 2001

Planning Commission  
CITY OF RANCHO PALOS VERDES  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

**RECEIVED**

**MAR 13 2001**

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Re: Long Point Resort

Dear Commissioners:

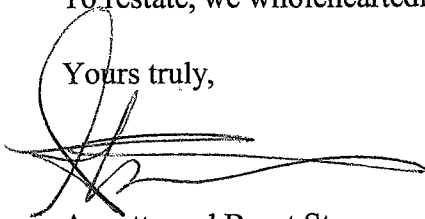
This shall confirm our support of the Long Point project and welcome its addition to our community.

Our community has long needed the amenities that the project will offer. We look forward to seeing green where now there is asphalt, to enjoying the extensive system of trails that will be provided. As to purported negatives, we understand that its current plan significantly increases the natural habitat area over what currently exists and that there will be less traffic to the resort than there was when the property was operated as Marineland – certainly no negatives there.

In addition, the millions of dollars the resort's operation will add to City coffers is certainly a plus!

To restate, we wholeheartedly support the Long Point Resort project.

Yours truly,



Annette and Brent Stevens

**225A**

**Los Angeles County**

501 Deep Valley Drive, Suite 315  
Rolling Hills Estates, CA 90274  
(310) 541-9344

**Orange County**

1200 N. Main Street, Suite 510  
Santa Ana, CA 92701  
(714) 545-2141

March 27, 2001

Reply to:

Rolling Hills Estates

**RECEIVED**

MAR 28 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

**CITY OF RANCHO PALOS VERDES**

30940 Hawthorne Boulevard  
Rancho Palos Verdes, CA 90275

Attention: City Planning Director

Gentlemen:

I have just recently received notification that apparently there has been a Draft Environmental Impact Report released for the Long Pointe Resort.

We have been very interested in any determination to allow a resort to be built at that location. One area that we know the Environmental Impact Report has not considered is the impact of sound and its transportation of sound to the south, based upon prevailing wind conditions. At this time, we would like to know the availability and cost for a copy of the Draft Environmental Impact Report so that we may forward a check to you for a copy, as well as all associated documentation concerning the Long Pointe Resort.

This request is being made in compliance with a request for governmental records, in accordance with Government Code, §6250, et seq.

Thank you for your anticipated cooperation in this matter.

Sincerely,



Ivan K. Stevenson

IKS:dl

cc: Marilyn Lyon, Mayor  
Les Evans, City Manager

226A

**Los Angeles County**

**Orange County**

501 Deep Valley Drive, Suite 315  
Rolling Hills Estates, CA 90274  
(310) 541-9344

1200 N. Main Street, Suite 510  
Santa Ana, CA 92701  
(714) 545-2141

April 6, 2001

Reply to:  
Rolling Hills Estates

**In re:**  
**Environmental Impact Report for Long Point Project**

**CITY OF RANCHO PALOS VERDES**  
Department of Planning and Code Enforcement  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Attention: David Snow, Project Director

Dear Mr. Snow:

We are submitting our response to the Environmental Impact Report ("EIR") prepared for the Long Point Project in the City of Rancho Palos Verdes. This is also referenced as Coastal Permit 166, Conditional Use Permits 215 and 216, Tentative Parcel Map 26073 and Grading Permits 2229 and 2230.

The response is being filed not only on behalf of the undersigned, who resides at 32547 Seahill Drive, but also for those citizens who live to the east of Long Point and for all citizens who wish to preserve the unique rural nature of the Peninsula in and around Long Point.

**COMPLETENESS OF EIR REPORT**

The copy of the EIR Report purchased at the City of Rancho Palos Verdes was incomplete. As an example, the EIR Report did not contain Exhibit 5.1-17 Photo Simulation #12. We also note that the distribution list was also missing from our copy, which makes it difficult to respond to the various entities and parties interested in this project. As a result, there is a serious question whether the EIR Report made available to the public was, in fact, a complete copy or whether it was a deliberate and wilful act to omit specific documents.

**227A**

There is a serious question as to the legality of the EIR Report submitted. EIR Reports are to contain specific instructions dealing with the response time and notification. This information was not contained in the copy purchased from the City of Rancho Palos Verdes. Thus, there is a serious question as to the validity of the EIR's compliance with the notification and instruction requirements for review and response.

**227B**

As confirmed with Mr. David Snow of the City of Rancho Palos Verdes, the copy that was received was allegedly the same copy sent to other entities and made available to the public. As a result, this EIR Report is incomplete since pages are missing, as referenced earlier. In addition, the Report did not include a distribution list of the entities, agencies, and

**227C**

**RECEIVED**

**APR 06 2001**

**PLANNING, BUILDING,  
& CODE ENFORCEMENT**

# **CITY OF RANCHO PALOS VERDES**

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 2

corporations who received copies of the EIR, to permit those persons questioning the EIR to notify all those concerned. As a result the EIR Report is technically and legally insufficient as it presently stands. Hence, it raises serious questions as to the City's effort to assist the development, because it does not allow those who question the EIR Report to contact other agencies who may have comments on the issues raised by other opponents to the EIR Report. This deficiency requires a further review and a re-distribution of comments made to date, to all of the reviewing agencies, entities, individuals and corporations that received the initial distribution.

**227C**

## **OBSERVATIONS AND BASIS FOR OPINIONS**

We would also like to point out that the undersigned has represented both governmental agencies, as well as private individuals, addressing EIR Reports on Federal, State and City levels. The undersigned has been a resident of the City of Rancho Palos Verdes since 1979. As a result, I have witnessed the existence of Marineland and its eventual demise, as well as its current use as a television and movie site, wedding reception location and helicopter landing pad.

Throughout the EIR Report they refer to the present Marineland site as a blighted location, due to the deterioration of the remaining buildings on-site, excepting the Catalina Room and the administrative offices for York Long Point Associates. In some respects the description is somewhat correct. Due to the lack of maintenance of the property, it does give an air of abandonment. The failure to maintain the property by routine maintenance and upkeep has created this appearance of disrepair. Is this really a blighted situation or one in which the present land owner has failed to act to maintain his property? This is especially true since York Long Point Associates have been involved with the property for over a year now. Maintenance of the property not utilized is certainly an indication of what is to be expected in the future. This raises questions and concerns of the future of the property in question.

**227D**

Further, the response time, per the EIR, was to be 60 days. Arguably, the 60<sup>th</sup> day is April 7, which means City Hall should have been ready to accept comments up to and including April 7, 2001, if they were open, or April 9, 2001, if they were closed. This was raised with Mr. Snow, who conceded that the last day to respond of April 6, was less than the 60 days specified in the Report.

**227E**

## **LAND USE**

The issue of the use of the property has been fully addressed in the EIR Report as to whether it should be (1) A resort hotel with an adjacent golf course; (2) No alteration of its present condition; and (3) Other alternatives.

Given the condition of the property and the existing building facing Palos Verdes Drive South, we must concede it is an "eye sore." If the property is to remain vacant and/or converted to an open area, then appropriate steps will have to be taken to demolish those deteriorated buildings. Is this a realistic solution given the economic desires of the present property owner? Obviously, it is not. May the present land owners utilize this property for other

**227F**

**CITY OF RANCHO PALOS VERDES**

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 3

alternatives? Yes. However, the question becomes what and how those alterations impact the environment and the surrounding community? The surrounding communities are impacted both environmentally and socially as a result of the proposed use of the property.

**227F**

Obviously, given the approvals to date and the underlying desire of the City Council toward development, as evidenced by the numerous areas of new development, the issue of developing the Long Point property for commercial use appears to be a given. However, the EIR Report is sorely lacking information concerning the impact of the development of a hotel in the general area, on, not just on purely the environmental grounds, but on the citizens who are part and parcel of that environment.

There is no argument that developing this area into a golf course would create a open area unto itself. However, as been evidenced by Ocean Trails development, the greatest minds cannot fight mother nature, who decided to take back the 18<sup>th</sup> hole. Granted, the political entity is now better educated, but experts will tell you what you want to hear, in order to meet the needs of the entity that is paying the bill. As a result, once the property is developed, a horrendous amount of water will be introduced to accommodate the fairways and greens, which will cause water infiltration into the soils, with additional influx of pesticides which will find their way into the ocean and thus, affect the marine environment. As a result, this EIR Report has indicated the environmental impact to be minimal, but in fact the impact will be serious and dangerous.

**227G**

It is obvious that the City considers the Long Point development as an economic boom for the City. However, the long term affect is other than an economic boom. It is an environmental nightmare. At one time the hotel was intended to be a draw for the Asian market. Statistics have shown that the Asian tourist market has dropped dramatically. Further, how long will a hotel in this location last economically? The continuing economic woes of Japan in particular, and Asia in general, indicate that these statistics will get worse.

The fact that the Asian tourist market has contracted means the hotel would rely on local tourists. A hotel, spa and golf course in and of themselves would not be enough to draw tourists. A nine hole golf course does not draw people, nor does a health spa. Weather conditions on the Peninsula are such that it is continually cooler than other nearby locations. There is no sandy beach and never will be. The view is spectacular, but a view will not draw guests on its own.

**227H**

How long would a resort hotel last on the Peninsula? To answer this question, one must look at both the short and long term effects, before making a decision to build a hotel. A careful study of hotels throughout the world will clearly show that there has to be more than simply a view. In this case the proposed hotel will not have a full championship course to keep people interested. Thus, the economic viability of such a hotel is dubious.

**TRAFFIC PATTERNS**

There is no question that the construction of a resort hotel at Long Point will result in a horrendous increase in traffic along P.V. Drive South and Hawthorne Boulevard. In addition to the increase in traffic, which will increase noise levels, decrease air quality, it will also endanger the local community. For example, along P.V. Drive South, to the east of Long

**227I**

## **CITY OF RANCHO PALOS VERDES**

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 4

Point there are homes within 30 feet of the roadway. Given the fact that the hotel will provide intoxicating liquors, the possibility of intoxicated people losing control of their vehicles causing collisions, hit and runs, and the resulting fatalities will increase dramatically. The roads along P. V. Drive South are of a dangerous nature for those who are unfamiliar with the road. One need only drive the Portuguese Bend Slide area to realize that unless that road is maintained on a quarterly basis, the road drops off rather severely resulting in drivers losing control of their vehicles as evidenced by police reports on file with the Los Angeles County Sheriff's Department at the Lomita Station.

227I

Hawthorne Boulevard creates its own dangers in and of itself due to the steepness of the hill and the curvature of the roadway. As result, the frequency of collisions with the center divider and/or people driving off the road will also increase. With the increase in the population in the subject area, due to recent development, the frequency of accidents have increased. By now introducing a 400 room hotel, with 50 casitas, will only increase the accidents more dramatically. Combined with the fact that you have people unfamiliar with the local winding roads, there will be an increase in accidents, heavier traffic, all of which will result in increasingly serious injuries, if not deaths.

### IMPACT ON OTHER CITIES

Regardless of the EIR Report, which attempts to minimize the substantial traffic flow problems which will occur, the subject back side of the Peninsula only has three means of ingress and egress. The first route is from Los Angeles/San Pedro, which is a single lane highway, beginning at the border of Rancho Palos Verdes and the City of Los Angeles and remains a single lane until the area after the Portuguese bend. The second incoming/outgoing direction is from Hawthorne Boulevard which presents a two-lane road for the entire length in Rancho Palos Verdes. However, you also have multiple uncontrolled traffic intersections, which result in dangers to local drivers who must cross or enter onto Hawthorne Boulevard. The third route is through Palos Verdes Estates. This area consists of a single lane as one transitions from Lunada Bay to Malaga Cove. The resulting impact on Palos Verdes Estates will be horrendous given the fact that the traffic will increase from the South Bay area. Further, the dangers involved concerning the stop signs which control the Malaga Cove area will also be significant.

227J

The serious question becomes whether the surrounding cities will be able to withstand the impact of traffic which will occur? What about the truck traffic? Obviously, truck traffic will be restricted to two directions. The Portuguese Bend becomes the direction of choice which will severely impact that area, and which will also increase the deterioration of the road with the increased vehicle weights. Hotel deliveries usually begin at 10:00 p.m. through 6:00 a.m., which will impact the surrounding residential community with increased noise, poorer air quality and heavier traffic.

The present EIR Report minimalizes that which is going to be a serious and harsh impact to the Peninsula and serve as a detriment to the community and environment overall. As such, the EIR Report is not an accurate evaluation.

### ENVIRONMENTAL SETTING IMPACTS AND MITIGATION MEASURES

#### Section 5.1 - Aesthetic Light and Glare

# CITY OF RANCHO PALOS VERDES

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 5

The entire backside of the Peninsula has always had its rural appearance preserved. As a result, street lights have been frowned upon and often opposed vehemently when suggested. Hence, there are minimal street lights in the area. Recent housing developments maintain this quality.

We note from the EIR Report that there is no serious discussion regarding the remarkable impact of a hotel operation in this aspect. The Report has obviously been slanted to indicate that although an impact will occur, it will be minimal because it will be controlled by the Planning Department. However, one must remember that the lead agency happens to be the City of Rancho Palos Verdes Planning Department, which follows the whims and desires of the hiring agency. In other words, the preparer of the reports is nothing more than a gun for hire that will do the bidding of its employer. This EIR Report's failure to address thoroughly certain issues while glossing over other highlights pro-growth development views at any cost.

227K

It is interesting to note that there is absolutely no discussion of the lighting plans for Long Point. There is no question that since we are dealing with parking structures, a hotel, casitas, walkways, and swimming pools, that there will be a dramatic increase in the lighting of the general area and thus light pollution. One argument is that Marineland operated with a number of lights. However, Marineland closed down at sunset as a general rule and only extended its hours to 9:00 p.m., during the summer months. All lights were then toned down, and entry lights were turned off.

The lighting impact can best be exemplified by night filming at Long Point which lights up the coast and can be seen for miles. The introduction of a large commercial development, such as a resort hotel will greatly impact the surrounding communities. The entire community to the east will be impacted by the increase of ambient light throughout the area. The reason for purchasing homes on the back side of the Peninsula has been to enter a rural area and to be able to see the stars at night. With the increase of ambient light from the resort hotel, parking structure, parking lots, walkways, etc. the ambient light will eliminate that possibility. Thus, it will violate the City of Rancho Palos Verdes' intent and purpose of the General Plan and create a loss in the property value to the surrounding community, who will now be denied the luxury of star lit nights. Further, the impact will not only cause a strike to the community at large by increasing the amount of ambient light present, but will also affect all forms of wildlife currently existing in the surrounding area, especially nocturnal wildlife. To this day seals can still be heard barking at night. This will cease to occur with the increase in noise and lights from the resort hotel, along with the introduction of fertilizers and other chemicals into the marine environment.

The EIR Report indicates that there will be a minimal impact created by the increased lights. This is not true. It will have a horrendous and plainly visible effect on the community, and the wildlife that the community has come to know and enjoy.

## Section 5-2 - Air Quality

As addressed previously, the existence and operation of a commercial entity on Long Point will decrease the air quality that we have come to know and enjoy. Not only will there be an increase in all forms of pollutants in the air, but given the prevailing wind conditions, the communities that lie to the east will be inundated with these pollutants. Further, the plant and

227L

# CITY OF RANCHO PALOS VERDES

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 6

animal life that currently exists will also be affected by this increase, not only by the operation of equipment and vehicles, but also by other pollutants generated by auxiliary generating systems, refrigeration, maintenance and the day-to-day cleaning of the overall hotel area. Environmentally the impact is dramatic in the detracting of air quality in the area surrounding the hotel both up the Peninsula and to the east.

227L

## Section 5.3 - Biological Resources

Once again, the EIR Report short shrifts the biological impact of the resort hotel in the Long Point area. The increase in the amount of foot traffic caused by the existence of a hotel, severely impacts the entire biological make-up of the area. Not only does it impact the flora and fauna but in addition, the increase in people means an increase in maintenance, which then causes an unavoidable increase in pollutants that enter the subsoil and which affect the biological make-up and essence of the entire Peninsula area. In addition, the confluence of biological detritus entering the ocean in the immediate area will affect marine life around Long Point, and to the east as well as southward of the Long Point area. The impact of the golf course, for both the Long Point area as well as Upper Palos Verdes area, will increase the amount of waste water and pollutants which will deteriorate the overall quality of the biological systems and balance of the area.

227M

## Section 5-5 - Geology, Soils and Seismicity and Section 5-6 - Hydrology and Drainage

These sections are handled separately in the EIR. The impact of the overall construction and subsequent installation of a resort hotel with a golf course, parking structures, etc., need to be addressed as one.

The increase of such a large artificial introduction of water into the soils create geological instability. One need only look at the Portugese Bend area to understand the impact and resultant devastating effect of water entry into soils in this ecological area.

This City is fully aware of the impact of the removal of soil and the introduction of water into the slide plane and the resulting destruction of homes and livelihoods. There is no question that the impact of water introduction in the entire area will have an unstable effect. As another example, the recent storms have revealed a deteriorating condition of the slope adjacent to the westbound lanes of P. V. Drive South, as you approaches the Point Vicente Lighthouse. Coming from the opposite direction one can see an increase in the amount of rock slides that have occurred with the erosive conditions existing. This was a result of a mere 13 inches of rain.

227N

The effect of watering a golf course to maintain the greens and fairways will greatly impact the area within one month, which will be compounded over a year, creating unstable soils. One would have thought that the City would have learned its lesson from the Ocean Trails Golf Course. In reviewing the EIR Report, the engineers have obviously failed to do appropriate tests to measure the effect on the soils with the introduction of copious amounts of water, especially on the upper Palos Verdes area and its inevitable deleterious effects on the down slope area.



## CITY OF RANCHO PALOS VERDES

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 7

Combine that problem with the increased amount of water to be introduced from the Long Point development, which has not had irrigated water on the soil over the last 20 years, and you will increase the deterioration of the bluffs, ocean, and specifically the tide pools in that general area. As far as the effect of soils entering the water and smothering sea life, one need only look at the Portuguese Bend slide area, and the coastal area to the east and south of the Portuguese Bend, to see its negative impact. Once again, the City of Rancho Palos Verdes should well know the dangers of not taking into account water introduction into soils, based on the events that have occurred in the Portuguese Bend slide area, the Abalone slide area and the Ocean Trails 18<sup>th</sup> hole failure. If the City of Rancho Palos Verdes seriously believes that there is a difference in these two sites in the same location, which make the Long Point area immune from such geological and hydrological drainage problems, then obviously the City has failed to take appropriate steps in hiring a competent and knowledgeable civil engineer, soils engineer and geotechnical experts. The EIR only compounds and rubber-stamps that ostrich approach.

227N

The City is also aware of other conditions present throughout this area as evidenced by the spontaneous blow-out and slope failures that occurred along the areas developed by the Great Lakes Carbon Company in the late 1960's and early 1970's. The new City officials and the Planning Commission lack historical aspects of the Peninsula or they are deliberately trying to mislead not only themselves, but also the public at large to whom they owe a fiduciary duty concerning the dangers involved in the introduction of water into a geologically compromised location.

Further, the EIR Report does not address the issue of the effect of the introduction of great quantities of water into an area that has gone unirrigated for approximately 15 years and its impact. The EIR does not really address what is going to occur as a result of that introduction, since no testing or soils studies were actually performed or at least reported. The Report consists of common geological reference works. There is no indication in the Report as to where and when borings were done in the cliff face.

### Section 5.8 - Marine Resources

The EIR Report also fails to address the impact by the introduction of not only the water runoff and pollutants, but it insufficiently addresses the issue of increased noise and lighting on the marine environment. An argument can be made that the hotel will sit on a bluff and therefore will not affect the sea life below. One well knows that the increase of pollutants that will be introduced and cannot be prevented from flowing into the ocean, will cause death and destruction of the marine life in and about the Long Point location. Further, as indicated previously, seals and other sea life can still be seen on the rocks below Long Point. The increase of pollutants, lights, foot traffic and noise created by incoming and outgoing trucks and equipment will have a deleterious effect on the marine life.

227O

The increase of the pollutants and other environmental impacting processes described above will also have an effect on the bird life that consistently visits the shoreline below the Point, also to the detriment of these animals. It is interesting to note that in the Report the individuals from Irvine seem to minimize the impact on the respective fauna and sea life that exist in the area. As the Report indicates, they only walked in areas on a single day in a month to prepare their own report which indicates the need to return to the area to do further studies during the appropriate seasons. This Report very interestingly does not delineate the

dates, nor the times when this study was done. This Report makes it difficult, if not impossible, to determine the validity of their findings at it relates to the fauna and the impact on the marine line.

Anyone who seriously believes that there will be no impact or will have minimal impact on the flora, fauna and marine life in the area is an attempt to deceive

#### SECTION 5-9 - NOISE

This section of the Environmental Impact Report, is severely inadequate. According to the EIR Report, there is no question there will be a significant and ever increasing amount of noise created by the hotel. However, the EIR Report then indicates that the noise increase will be minimized by the placement of sound barriers in the hotel area.

However, the EIR Report is totally devoid of addressing issues that occur with hotel noises and the way that noise travels at night.

It is interesting to note that all test studies were during the day. It was also done at the time of the day when there was an offshore breeze, not an on shore breeze. As a result, the report is faulty in several different areas and does not take into account the movement of sound that is created by the wind which occurs during the onshore flow period, which usually occurs at 4:00 to 5:00 p.m. in the afternoon, and continues through the night. At the time of the EIR study, which was in March, all the studies took place between 1:30 p.m. and 4:30 p.m. It is also interesting to note where they took their readings within those time frames. They have limited themselves to the area immediately around Long Point and not to the effect of what occurs as you move further eastward and as the winds change in the late afternoon and the evening.

Further, the EIR Report indicates that further studies would have to be done during construction. The problem is that these need to be addressed now, before the construction is even authorized to or permitted to commence.

As an example, once the wind switches and we have an onshore flow, as it whips around Point Vicente, the wind moves from the west to the east because of the physical makeup for the Palos Verdes Peninsula in this location. As a result those things which occur to the west, i.e. at the Long Point, have a direct affect on all of the neighboring communities to the East. As an example, during a loud party at the Catalina Room at Long Point, where screaming, yelling and band noise moved out onto the grass area behind the Catalina Room, everything could be heard in the community beginning at Nantucket and moving eastward past St. Peter's By the Sea Church.

As another example, even during the period that Marineland existed, at night it was common to hear the seals bark back and forth in the holding areas of Marineland. Even at the present time when seals gather at the base of the Long Point bluffs, they can be heard in the evening barking back and forth because of the prevailing wind conditions. Each of the studies that were done on the part of EIR Report was apparently deliberately and willfully limited to specific areas that were tightly controlled around the Long Point and taken at a time when prevailing wind conditions did not address conditions that occurred in the evening. Further, the

2270

227P

**CITY OF RANCHO PALOS VERDES**

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

Page 9

studies were done when there is little if any truck traffic in the area. You cannot stop the transmission of noise in the evening by noise barriers as cited in the EIR Report. This is environmentally detrimental.

Further, the fact that the hotel will have seven outdoor pools planned for the resort, if these pools are used in the evening, the noise and the yelling that takes place around a pool will be transmitted to the local community. It will not just occur to the community along Nantucket, but also continuing eastward and uphill along the back side of the Peninsula.

The contour of the Peninsula in this area has not been taken into account and the EIR Report does not address the impact of the noise levels on the surrounding community other than along Nantucket.

There is no question that the increase in truck traffic will have a detrimental effect on the entire community, if a hotel is allowed to go into Long Point. The EIR Report itself concedes the increased noise. However, the intent and purpose of the EIR Report, is to minimize, if not eliminate the impact of any project that will have an effect on the surrounding community and the environment therein. The truck noise alone, for delivery and upkeep of the project once it is developed, in and of itself is sufficient to cause a disapproval of this project overall.

Next, the fact that the hotel is dealing with banquet facilities, parking lots and people walking in and around the hotel, going to and from swimming pools is going to increase noise throughout the entire area and it is nothing that is going to end at closing time of dusk or 6:00 p.m., but something that is going to continue 24 hours a day, 7 days a week, 365 days a year for an indeterminable amount of time that the hotel may exist. As a result, the EIR Report is woefully inadequate and does not address the impact on the surrounding community based upon noise carried on prevailing wind conditions in the evening and night hours.

As a side note, with the increase in windspeeds that occur in the evening, up to as much as 20 to 30 miles per hour, the noise travels louder and further.

An exemplification of this effect of loud noise in the area can best be addressed by what has occurred in the last 30 days, with a party that occurred at Albergo Court and P. V. Drive South, with a band and a large group people. Numerous telephone calls were made by the local community to quite the party, because the noise was echoing throughout the entire community to the south and eastward of the party. The noise extended from the Long Point all the way eastward as far as Clipper Road. However, the study at that time did not take us beyond that point, although it most likely went into the Portugese Bend area, given the prevailing winds at that time.

This was followed within a week to two weeks by another party at the Recreation Facility on Seawolf, where because of a pool party, numerous telephone calls had to be made by the neighbors to the north, south and east to quite that party.

What is going to occur once a hotel is in place and the hotel guests are outside the pool with children who are screaming and yelling or playing loud music on their portable radios? That cannot be controlled and will create a greater noise impact on the surrounding community.

**227P**

# CITY OF RANCHO PALOS VERDES

Department of Planning and Code Enforcement

Attn: David Snow, Project Director

April 6, 2001

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Environmentally, the choice of living on the backside of the Peninsula was with the specific intent to live in a rural area. The increase in noise takes away that ruralness. A hotel cannot be kept quiet. A hotel cannot operate without noise. This can easily be tested by visiting the Marriott Desert Springs Hotel, as an exemplification of the degree of noise that can occur in and about a recreational resort hotel.

If you wish to challenge that idea, then a visit to any major resort area, such as Waikiki Beach, Hawaii, Monterey Bay, California, Torremollinos, Spain. Tumon Bay, Guam, Kuta Bali, Cancun, Mexico and any Caribbean Island. The result is always the same: there is an increase in noise. In each of the instances specified above, residential areas have been moved back and away or the construction of these hotels took place before the residential development. Kuta, Bali and Monterey, California being the only exception. Further the officials in those locations took steps to keep the residences away from the commercial area to avoid just the problems that will be introduced by the development of a hotel at Long Point. As an example, the Caribbean hotel locations are not near homes. In Cancun, Mexico their major developments are not near homes. The same would apply to Tumon Bay, Guam.

227P

In this case, you are asking to move a major resort hotel into a community that was able to coexist with Marineland which closed at night and did not operate late into the night. At night you only had barking of seals and sea elephants. However, the thought of a 24 hour operational commercial entity means the community will be impacted and it results in an impact not only on the people, because of the increase in noise levels from the hotel itself, but also from the adjacent traffic increase that will inevitably occur to the detriment of the community and the environment in general.

Further, the EIR Report is totally deficient in addressing the noise level issue as it relates to wind carried noise and the echo effect created by the topography of Peninsula in this area. There appears to be a deliberate and willful attempt by the entity that created the EIR Report, to limit themselves to a very tight area surrounding the Long Point and at limited times consideration of the effect on the surrounding community. The issue of noise was raised at a meeting directly with Mr. York and Destination Development Corporation representatives. At that meeting they indicated that the studies had been shown developed with only one direction in mind. It was measured only toward a vacant hillside. The specific question was raised, why were there no studies that were taken to the east that impacted the various communities, including the Bayview Club of the Porto Verde Apartments, the Seahill Townhomes and the other communities that were preexisting in the area. At that time there was no answer given and we were asked to sit down. This EIR Report deliberately avoids addressing this issue. It appears to be a deliberate and willful attempt not to put forth a proper and fully detailed EIR Report concerning the affect that noise will have throughout the surrounding residential communities.

The increase of noise exceeds the necessary standard levels and therefore in and of itself creates a requirement that this hotel not be permitted to be built in the area.

## SECTION 5-10 - PUBLIC HEALTH AND SAFETY

Statistically, the police departments in any given City where hotels are located will confirm that regardless of the grade or level of hotel, the end result is the still the same. It is the degree of illegal acts that will vary. In the presence of any hotel you begin to have acts of

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# **CITY OF RANCHO PALOS VERDES**

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theft, assaults, rapes, drugs, burglary, and robbery. In five star hotels efforts are made to keep these incidents quiet. The impact on the surrounding community is horrendous. Not only do you have the criminal element entering into and becoming a part of the community, but you also increase the police presence to offset the crime increase. A hotel also brings crime to the surrounding businesses. Although society insists upon looking at criminals as being "stupid or ignorant" unfortunately, criminals and streetwise individuals are far more astute than one thinks, which creates a sufficient danger to the community as a whole. Each city tries to squelch the increase in their crime rate created by hotels and/or motels. The police departments and security companies can confirm the expected increase in crime rate.

Much of the issue of the public health and safety has previously been addressed in earlier comments. There is no question that the increase in traffic will increase the potential for serious, dangerous and fatal accidents. The introduction of a commercial hotel in the area will also increase the amount of robberies, assaults, rapes, burglaries, grand theft auto and similar crime that is inevitable in any location where a hotel is in existence. No matter how hard we claim that the Rancho Palos Verdes area is different, unfortunately, the hotel will bring that criminal environment to Rancho Palos Verdes, which although it exists minimally in comparison to other areas, will increase dramatically once a hotel is introduced. In addition, these crimes will take place not only within the hotel itself and on the grounds of the hotel, but also in the surrounding communities, once the criminal element realizes the "easy pickings" of the local community. It is interesting to note that the issue of public safety in that environment is not even addressed by the EIR Report, which is something that needs to be addressed and seriously and honestly measured against other hotels, either by security departments or through the police department.

The EIR Report is also deficient in addressing the impact of the burden placed on the fire fighting personnel to respond to emergencies at the hotel, which will increase the potential for disastrous accidents on the roadways leading to the hotel, the noise level increase by wailing sirens and the withdrawal of fire and police from the community while they respond to problems at the hotel.

Further, the Public Health and Safety section is deficient in addressing the reality of the claimed disaster routes for evacuation purposes.

As can be confirmed by any geotechnical experts specializing in earthquakes. In the event of a major earthquake, the most likely disaster exit route of P. V. Drive South will be non-existent. The Portuguese Bend area of P. V. Drive South most likely will cease to exist. As a result, one of the major disaster routes will be removed thus creating a greater impact on the evacuation of people and personnel out of the Long Point area and the surrounding community, as well as emergency crews into the area.

The next route will be to drive up Hawthorne Blvd. However, historically there have been spontaneous blowouts and slumping along Hawthorne Blvd. This condition goes back to the 1970's during development by the Great Lakes Carbon Company. Further, as you go up the hill from the Golden Cove location, numerous area already are showing erosive failure and will most likely result in road failures in that area. This will most likely occur in and around the bends near or about the City Hall towards the lookout point.

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**227R**

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Further, the tremendous effect of evacuation through that route will put a strain on all surrounding communities.

As far as using P. V. Drive West , although not designated as a disaster route, will also most likely be lost between Luanda Bay and Malaga Cove. This area continues to fail since the attempt at construction on the bluffs in that location.

Further, there is an assumption that other areas along Hawthorne Blvd. will not be closed off because of failures, which means you have trapped people. With the increase in the number of people, caused by the existence of a commercial hotel in the area, creates an impact on the entire area that is going to exceed the rescue capabilities of the Los Angeles County Fire Department and the Los Angeles County Sheriffs. This issue has been the subject of discussion with the emergency response teams and the sheriffs' department for this area. Further, the subject has also become of special interest, because of the existence of faults in the general area and their impact, as discussed with geotechnical experts in the field of earthquakes, as well as the resulting soil movement.

As a result the EIR Report is deficient in addressing vital public safety issues in the event of a disaster.

As far as Public Health is concerned, that issue has been addressed earlier in this response as it relates to pollutant runoffs and the effect on the general public and the introduction of hazardous material in and about the area caused by the creation of a hotel in the area.

Further, due to the lack of action on the part of the present landowners to take care of what is apparently hazardous materials on their own property, there is a serious question as to the proper method for cleanup of these hazardous areas. Since York Associates has taken no steps to clean up Long Point, it raises some serious questions as to who they expect to incur the expense, time and effort to clean up these environmentally impacted areas.

It is a known fact cars sitting in a parking lot in and of themselves will cause the introduction of oil, solvents and other material into the concrete, which seeps through the concrete and into the soils thus causing further environmental problems. It is interesting to note that no real geological studies were performed to confirm the presence of hazardous material throughout the Long Point area, were there any real steps indicated as to how to protect the adjacent community from the hazardous material that may be present. It is also obvious that those who did the study also have a very poor understanding, or lack of understanding, of the seepage of hazardous material through concrete. They indicated that there were no staining or observable leaks on the concrete and therefore they determined that there was no problem. However, it is a known fact that material, including gasoline, will seep through concrete into the soil and over a period of time any staining will have been washed away because of the soluble salts that come up through the soil and basically bleach the concrete. As a result, there has not been adequate testing to address environmental hazardous material that exists on the property in question.

Further, the comings and goings of helicopters that have occurred on Long Point also create the introduction of exhaust material into the ground that contain oil and gasoline particles which also have not been addressed.

**227R**

**227S**

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### GOLF COURSE ISSUES

The other issue is the effect of the errant golf ball. In order to protect the public from errant golf balls, one would have to argue that huge nets would have to be installed to prevent the balls from striking passing vehicles or people. Does that not detract from the environment with the existence of these huge poles that rise 60 feet in the air with netting. Is that not an environmental impact? Is that not a detriment to the vista and views that exist on the Peninsula. On the other hand we could have no poles, we could have no netting, but instead we could have errant balls striking vehicles that are driving between 40 and 50 miles per hour on P. V. Drive South. As a result, the car goes out of control resulting in death and destruction. Is that an answer?

Or, we have individuals who happen to be along the walking paths of the bluff and we have an errant golf ball that strikes the individual. In normal instances, if a participant is on the golf course, there is an assumption of the risk of being hit by a ball. However, there is no assumption of the risk when the individual is along a nature path, when an errant golf ball strikes him.

In order to forestall the dangers of an errant golf ball, the result will be an environmental impact in the form of unsightly poles and netting. The failure to do so increases the danger to the general public by errant golf balls.

There is another problem that has not been addressed by the EIR Report and that is the issue of errant golf balls that go off into habitat areas. Now we have the introduction of a deteriorating golf ball in a habitat area that endangers the animals and the insects and other flora and fauna in the area. Again the EIR Report is deficient and it does not address the impact of errant golf balls that will deteriorate, given the sun, moisture and the makeup of the golf ball themselves over time.

Of course, we will always have the golfer who will go out into the rough areas to retrieve these balls, but now we have him trekking into an environmental area where flora and fauna are now put in danger by the individual moving through these habitat areas to search for these golf balls.

### ALTERNATIVE USE OF LONG POINT

Obviously a hotel at Long Point is going to have a detrimental effect on the entire backside of the Palos Verdes Peninsula. It will have an effect on the CPH development to the west of Long Point in the form of increased traffic in the area. It will have a long term effect on the properties to the north since there is talk of converting the entire area into a golf course which affects public lands. It will effect the communities to the east including the Porta Verdes Apartments, the Peninsula Point, the Bayview and the Seahill Townhomes in the form of increased traffic, noise, pollution, introduction of public safety issues and health hazards. Lastly, it will affect the marine environment to the south with the increase of overflow of polluting materials as well as a general increase in the possibility of geological effects because of the increase of water in the area, as evidenced by the affect on the Portuguese Bend slide area, the Abalone Cove slide area and the Ocean Trails 18<sup>th</sup> hole debacle.

227T

227U

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Is there another alternative that has not been addressed within the EIR Report and the answer is: Yes. Obviously, the no use is not the answer either. Although, we would be happy with no further development. It is an issue of realism. At one time, the discussion was the possibility of turning this into an entire residential area. At this point the residential area with open areas combined with it, is the answer. For one thing, the number of homes built could not possibly increase the amount of noise level, environmental impact or traffic that would exist with the constant comings and goings of a hotel. The homes that would be built with the families that would move into those would be stable. There would be a control factor by the community itself in policing itself to prevent the increase of noise caused by uncontrolled parties. It will also establish a larger stable community, rather than transients. As a result, the alternative of placing residences in place of a hotel are not addressed as an alternative that would immediately decrease the impact in every category contained within the Environmental Impact Report.

227U

CONCLUSION

It is noted within the EIR Report, under the issue of Safety, Noise and the like, that further studies need to be done after the construction begins. The point of an EIR Report is that these issues need to be addressed now before construction begins. It is the old situation where the governmental agencies, the developer and other people involved say "well we started, we need to continue forward and we will just mitigate the best that we can." The problem is that the EIR Report is set up to prevent that failed type of planning from occurring and to take steps to address these issues before they become issues.

This EIR Report is deficient, it is incomplete and it fails to address significant, real issues. There is a serious question whether influence was utilized to direct the investigating entity to avoid certain areas in order to avoid addressing them. It is the old situation of "if it is not there it is not addressed." Therefore people who are not adept at reviewing these EIR Report are not going to know what needs to be addressed as part of that EIR Report.

227V

Overall, the EIR Report itself is deficient as noted herein. There are serious questions as to the legality of these deficiencies in a true Environmental Impact Report. Not only are there missing exhibits but the failure to indicate to distribution of this report for appropriate response raises questions. Further, the fact that there were no specific directions as to the proper address and the delivery point for any response, also questions the legality of the Environmental Impact Report overall.

Lastly, the deficiencies within the Report itself, addressed herein, clearly indicate that the Environmental Impact Report was intended to be a short, swift and a quick way to accomplish the development of the hotel, without serious consideration in addressing those things that are going to impact the communities environmentally and socially that surround the Long Point Development. It is this short sightedness contained within the Report that raises serious questions as to the true unbiased nature of that Environmental Impact Report and the findings contained therein.



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As a result, it is strongly urged that the Environment Impact Report be disregarded and that an entity that has no influence from either the City or from the developers, be permitted to do a true Environmental Impact Report that addresses the issues that have been raised, not only in public meetings with the planning commission, but also in written responses to the Environmental Impact Report.

**227V**

Basically, it has come to a situation where the politicians need to listen to the people of the community who are the voters and not to the developers who pay for the re-election of these politicians.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ivan K. Stevenson". The signature is fluid and cursive, with the first name "Ivan" being more prominent and the last name "Stevenson" written in a continuous, flowing script.

Ivan K. Stevenson,  
Resident of Rancho Palos Verdes, Member of Sierra  
Club, Member of the Cousteau Society, Member of  
the Palos Verdes Conservancy, Member of the  
Peninsula Emergency Response Team, Member of  
the Torrance Emergency Response Team, Member  
of the Los Angeles City Emergency Response  
Team, Member of Seahill Townhomes  
Homeowners' Association, Member of CORAL

3/13/01

Comments on EIR for the Long Point Resort. Presented at Planning Commission Meeting 3/13/01.

My remarks are devoted to the impact on the environment which would result from that part of the golf course and accompanying facilities proposed for the Upper Point Vicente Area (UPVA).

The layout proposed for the UPVA will result in fragmented habitat, consisting of four small areas, very narrow in a number of places. Much of the habitat will have been replanted and for a number of years will not be mature enough to attract and support wildlife.

228A

The habitat and hoped for wildlife will be subjected to disturbance by errant golf balls, by golfers in search of lost balls, by abnormal watering, the use of fertilizers, pesticides and herbicides plus the activities of maintenance crews and machinery.

228B

The grading and watering of the golf course will alter established drainage patterns and affect soil stability. Stairways, long switchback ramps needed for carts to negotiate the 180 foot change in elevation, the administration buildings, maintenance yards and roadways, all reduce the percolation area. Further analysis of golf course watering, drainage patterns and loss of percolation area is needed. We have seen closed traffic lanes on PV Drive due to flooding and mud after heavy rain. An example of the effect of development on drainage can be seen in the canyon at the upper end of Barkentine Road. Debris basins are needed as a result of increased runoff from the Presley Ocean Terrace development South of Crest Road between Highridge and Crest.

228C

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MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

p.1 of 2

The driving range presents the danger of flying golf balls to residents and churchgoers. Motorists are also in danger. A hooked tee shot from holes #2 and #6, parallel to PV Drive, could easily land in the roadway or hit a passing car. Tees should be at least 300 yards from the roadway and fairways should not be close to the road.

228D

The proposed tunnel needs further study. It will create traffic and utility problems during construction. A tunnel of considerable size will be needed to allow golf carts to pass each other. Because of the difference in elevation from one side of PV Drive to the other, the tunnel will have to be of unusual length in order to provide a slope suited to golf carts. Such a tunnel will produce an attractive nuisance and a possible danger.

228E

Construction of the golf course will destroy much of the habitat and wildlife. Mitigation measures are easily recommended but do not easily bring about a return to the natural state. Costly monitoring over years will be necessary to assure that the developer carries out the revegetation plans. The end result will ~~barely~~ represent natural habitat, and whether wildlife will return is not at all certain.

228F

William A. Jolliffe  
6347 Tarragon Road  
Rancho Palos Verdes

Appended to these comments are a number of questions that should be answered in the EIR.

Appendix to EIR comments dated 3/13/01.

## Biological Resources

During construction the project will destroy significant areas of habitat which will result in flight or destruction of wildlife. After construction the remaining habitat and revegetated areas will consist of several narrow and disjointed plots not favorable to wildlife habitation. Answers to the following questions would help understand the impact on habitat and wildlife and point out restoration time and cost.

1. Taking marginal areas into account, how much current habitat area is sustaining wildlife and how much area will there be after revegetation, capable of nurturing wildlife?
2. How many months or years before revegetated habitat will produce a wildlife sustaining area?
3. How much will it cost the city to monitor the restoration process in order to provide assurance that proposed mitigation will be completed?

## HYDROLOGY

Quantitative data and analysis are needed for determination of the impact on soil stability and runoff that abnormal golf course watering and loss of percolation area will have. The following questions need answers to anticipate runoff amounts or slippage due to saturation.

1. How many square feet of percolation area currently exist?
2. How many square feet of percolation area will be lost due to hard surfaces, such as stairways, cart paths,\* cart ramps,\* maintenance and administration buildings, equipment yard and parking lot?

3. How does percolation in fairways, greens and sand traps differ from percolation in natural habitat?
4. How does golf course watering compare with normal rainfall; in quantity, saturation or runoff?
5. How much runoff onto PV Drive can be expected?
6. What measures are proposed to handle this runoff?  
Debris basins and culvert entryways are problems, aesthetically and maintenance wise.
- \* In order to determine the loss of percolation area due to cart paths and ramps it is necessary to determine elevations and routes the ramps will follow and provide grades gradual enough to enable the carts to traverse the steep slopes.

## HAZARDS

To evaluate the hazards resulting from the proposed golf course design, the following data should be in the EIR.

1. To prevent golf ball accidents what are the prudent distances to be maintained; between tee and residences, between tee and pathways for the public, between tee and public roadways, between fairway and public road?
2. What will these distances be on the proposed course?
3. Who will be liable for the tunnel under city owned roadway in the event of accident, flood or earthquake?
4. Who will provide security to avoid the tunnel becoming an attractive nuisance? Especially at night?
5. What measures will be taken to avoid danger to golfers or pedestrians using the tunnel?

## SERVICE SYSTEMS

The tunnel under PV Drive presents problems because of its location and elevations. The following questions should be answered in the EIR.

1. What are the elevations at each end of the tunnel?
2. What length will be required to provide a gradual slope for golf carts?
3. What height and width are needed to allow carts to pass one another?
4. What will be done to avoid traffic disruption during construction of the tunnel?
5. What utilities will be disrupted during construction of the tunnel?
6. Where are the utilities located?

228J

Mayor Marilyn Lyon  
City of Rancho Palos Verdes  
30940 Hawthorne Boulevard  
Rancho Palos Verdes, California 90275

April 6, 2001

RE: I Support the Lower Point Vicente Property Softball Complex

Dear Mayor Lyon:

The City of RPV faces an exciting opportunity with the funding stream offered by the Long Point Development Project. As recently as January 2001 I was against the Long Point Development. Then I walked into a recent presentation by the development team. I walked away convinced that the vision and scope that this team has adopted is sound, and preserves and increases access to the natural environment we all enjoy on the Peninsula.

I moved to the Peninsula 23 years ago, lived in the same house, schooled my children in the PVPUSD, hiked and trained for the LA Marathon along its trails and beaches, walked with the PV Land Conservancy, volunteered with the PVP Girls Softball League (PVPGSL), built homes with Habit for Humanity/Long Beach Unit, served food to the homeless, etc. I enjoy living and spending my free time on the Peninsula!

Through my 22 years with the PVPGSL coaching girls, managing teams, serving and leading the Board of the PVPGSL, I/we've had to continually struggle to provide playing opportunities for the girls. Getting responsible, energetic adults to work with girls was a snap compared to negotiating with the PVPUSD and cities of RPV, RHE and PVE to gain access to playing fields. However, over the years the League has managed to scrape together the funds to build six fields on PVPUSD property which are comparable to the better fields off the Peninsula albeit without the surrounding open space. We pay to maintain the grassy areas of four of the fields throughout the year. Parent volunteers water, drag and maintain the playing fields during our playing seasons.

Our dream is to have a facility which will accommodate at least four regulation playing fields with dugouts, fences, batting cages, bullpens, spectator bleachers, snack shack, equipment storage areas, rest rooms, running water, electrical outlets, cement, grass and brick dust fields. Not only would it support our full program at one site, but we could host softball tournaments throughout the year and give more of our girls a chance to participate in a more competitive venue which so many want to have.

I am thrilled that the development project team and proposed business management team is offering a viable destination facility as well as a place to house meeting, large receptions and other special events. It also offers a funding stream to the City of RPV which will make possible so many needed improvements to our city.

Mike Tom   
28627 Seamount Drive  
Rancho Palos Verdes, CA 90275

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APR 06 2001

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& CODE ENFORCEMENT

229A

**Shelly J. Trainor**  
**3408 Gulfcrest Drive**  
**Rancho Palos Verdes, CA 90275**

April 1, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Reference: The Long Point Resort

Dear Mayor, Members of City Council and Planning Commissioners:

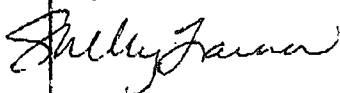
I have previously expressed my support for the Long Point Resort through a letter to the Editor of the Peninsula News. I feel strongly that current proposal for the Long Point Resort is an excellent use of both the land they currently own, plus the land which is publicly owned. The current state of the public lands is not conducive to use by the public. It would be an improvement to see landscaping and trails which add both to the visual quality and to the usability of the entire area.

I now understand that the Long Point Resort developers will contribute to the development of a softball complex. Our daughter plays softball in the PVPGSL and despite the inadequate facilities PVPGSL has wonderful coaches and teams. My support for the Long Point Resort is now very personal if it means that there will be a facility for PVPGSL to further develop and expand its program that gives girls in Palos Verdes the opportunity to develop teamwork, skills, self-esteem, and friends.

While I realize that there are those who very vocally oppose the Long Point Resort development and its use of public lands, I believe that many of them may not have young children nor are they the new residents of this city who are moving here to raise their families in an area with not only excellent schools, but also facilities for recreation. Most of us who do have families do not have the time to attend meetings to voice our views. I also think that the many who have not expressed an opinion either don't care, don't know, or are in support of the Long Point Resort.

I believe that the future of this community is not uncared for and undeveloped open space, but areas which provide opportunities for people, young and older, to enjoy this special city. If this community is to thrive, it needs to continue to attract and be desirable to families. The Long Point Resort with its softball facility for PVPGSL is one right way to pursue a strong and healthy future for Rancho Palos Verdes and its residents.

Sincerely,



Shelly Trainor

230A





Dear Mayor Lyon, Council and  
Commission,

Please build softball fields  
at Long Point Resort.

Tessa Lisa Yours Truly,  
U8 Angels Molly  
Maryll  
Elissa Sarah  
Sarah Benesh  
Jillia  
Carolyn  
Gemma

231A

MAR 27 2001

March 25, 2001

Re: The Long Point Resort

Dear Mayor, Members of the City Council and  
Planning Commissioners:

I am so pleased that I am afforded this opportunity as a Rancho Palos Verdes homeowner to express my thoughts on the old Marineland property. It has long been an eye sore to me.

On numerous occasions, members of my family from all over the world come to visit me at my home in Rancho Palos Verdes. It would be an absolute delight to be able to have them so close to me in a 5 star resort with all the amenities.

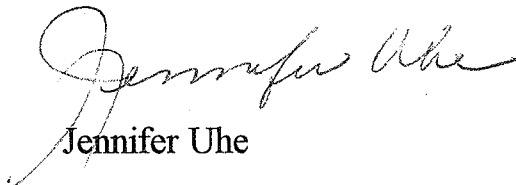
I have thoroughly researched the economic study requested by the city and find that it will generate 4.5 million in tax revenue annually to the city.

One of the greatest things that can be done is clean up Hawthorne and other main roads which in the future could be utilized for underground utilities.

I understand that they are going to protect the wildlife habitat areas.

I thank you for letting my voice be heard. I will be attending the April 10<sup>th</sup> commission hearing and look forward to meeting all of you.

Sincerely,



Jennifer Uhe

232A

Mr. Leslie W. Vien  
29532 Bernice Dr.  
Rancho Palos Verdes, CA 90275-1317

AFN - 3 1001 all cc'd for cc

8/2/01

Apr. 4, 2001.

Mayor Lyon, City Council and  
Planning Commission  
City of Rancho Palos Verdes  
38940 Hawthorne Blvd.  
Rancho Palos Verdes, CA

Re: The Long  
Point Resort

Dear People,

I am in favor of going ahead with  
this project.

Although I no longer play golf regularly,  
I have been and played on many courses  
in my lifetime. I personally feel  
there aren't many landscapes that  
compare in beauty with a well  
manicured golf course. Those who  
prefer to view the parched and  
weedy appearing shrubbery that  
proliferates on this hill neither have  
not cast their eye on a well  
curved links or maybe they should  
visit an eye doctor!

Just recently I took visiting friends  
to dinner at the Ocean Trails golf  
course. They were ecstatic over the  
beauty of the course and club house

233A

and have vowed<sup>2.</sup> to return this summer to play a round or two.

Frankly, I would be in favor of foregoing some of the public trails, picnic areas, etc. and building a full 18 hole course. Maybe we could move the city hall out of there, thus freeing up enough land for the other 9 holes. The tax revenues generated by the resort could help to pay for a new and more functional city hall elsewhere.

I like the idea of another first class facility on this hill - a golf course and all of the appointments this resort will provide.

Let the construction begin.

Leslie W. Veen

Mr. David Snow  
City of Rancho Palos Verdes  
Planning, Building, and Code Enforcement  
February 27, 2001

RECEIVED

FEB 28 2001

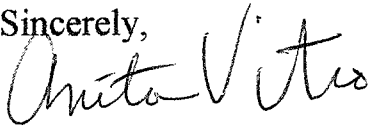
PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mr. Snow,

I am writing to protest the proposed "practice facility" on Hawthorne Blvd. It would significantly detract from the beauty and tranquility of the surrounding areas. Palos Verdes Drive West is one of the most magnificent drives, and to have it lead to a driving range is completely out of character for the city. Does the city really want all that such a facility would bring to the city? Something doesn't fit here: 4 million dollar, ocean front homes, a small, neighborhood church, half million dollar condos, DRIVING RANGE! Please consider creating a beautiful park area at that sight for all of us to be proud of. Maybe even the golfers could find peace and relaxation there.

234A

Sincerely,



Anita Vitro  
36 Via Capri  
RPV

**Les Evans, 08:00 AM 4/2/01 -0700, Fwd: Re- Long Point Development**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 02 Apr 2001 08:00:05 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Re- Long Point Development

Date: Sun, 1 Apr 2001 22:08:54 -0700 (PDT)  
From: von Nordenflycht <arvidvn@yahoo.com>  
Subject: Re- Long Point Development  
To: CityCouncil@rpv.com

Mayor Lyon, and all esteemed members of the RPV City Council.

Patiently we have waited for a world class resort and/or entertainment facility to finally replace the terribly blighted old Marine Land Facility. Now, finally it seems there might be some hope for this effort to come to fruition. Our family truly hopes you will see it in your collective wisdom to agree to the various trades of land to make this all possible. Shrub land full of tumbleweeds, old plastic containers, paper and yes, even an occasional rattlesnake, does not save the coast line for us!

Though I don't play golf I'd still would rather have the greenery of a golf course gracing our magnificent cliffs. On the other hand I surely could have had business for a convention type facility in this scenic setting many times over.

So, in short: We are strongly in favor of the Long Point Development.

Thanks for taking this input.

Arvid and Sue von Nordenflycht  
28849 Blythewood Dr. RPV

**235A**

---

Do You Yahoo!?

Get email at your own domain with Yahoo! Mail.

<http://personal.mail.yahoo.com/?refer=text>

RECEIVED

MAR 14 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

March 10, 2001

Mayor Lyon, Members of the City Council and Planning Commissioners  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

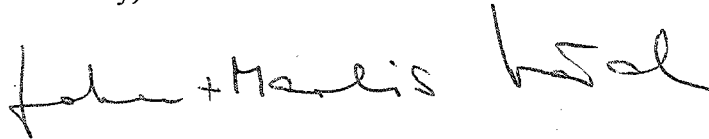
Dear Mayor, Members of the City Council  
And Planning Commissioners

Re: The Long Point Resort

We like to inform you that we support the proposed Long Point development. We believe the resort will be a great asset and a good source of revenues for our city.

236A

Sincerely,

A handwritten signature in cursive script that reads "John + Marlis Wachli".

John and Marlis Wachli

RECEIVED

APR 03 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

**THOMAS EDWARD WALL**  
*Attorney at Law*  
28729 S. Western Avenue Ste 206  
Rancho Palos Verdes, California 90732  
(310) 519 7808  
Fax: (310) 519 9352 Email: Denna98@Yahoo.Com

March 29, 2001

City of Rancho Palos Verdes  
Department of Planning  
30940 Hawthorne Blvd  
Rancho Palos Verdes, California 90275

Attention: David Snow

RE: EIR Long Point Resort Project

Dear Mr. Snow:

In reference to the above EIR I wish to point out there is no discussion regarding bike lanes. The City of Rancho Palos Verdes has committed itself to bike lanes and therefore the issue should be addressed. I did note on page 5.12-37 it was noted under the standard for residential streets does not allow for bike lanes.

237A

I disagree with the basic premises of the report that this project is to be viewed on the basis of the County of Los Angeles standards. The City of Rancho Palos Verdes has always placed a higher level on reducing traffic than the City and County of Los Angeles. An acceptable traffic congestion grade of D or E is not acceptable in the City of Rancho Palos Verdes.

237B

Very truly yours,



THOMAS EDWARD WALL



Les Evans, 01:33 PM 4/4/01 -0700, Fwd: The Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 04 Apr 2001 13:33:25 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

Date: Wed, 04 Apr 2001 12:36:55 -0700  
From: "The Wannamaker's" <wannamaker1@home.com>  
X-Mailer: Mozilla 4.72 [en] (Win95; U)  
X-Accept-Language: en  
To: CityCouncil@rpv.com  
Subject: The Long Point Resort

Dear Mayor Lyon  
Members of the City Council  
Members of the Planning Commission  
City of Rancho Palos Verdes

We are writing to urge you to approve the Long Point Resort, as proposed by the current developer. Opportunities to improve the former Marineland property have been lost due to long drawn out hearings, leaving the property in a disgraceful, unkempt condition. There is now an opportunity to give the City a resort to be proud of, managed by people who operate the Hotel del Coronado, which is certainly a world class hotel. Please do not allow this opportunity to slip through our fingers.

We do hope that the developer can eliminate the golf facilities adjacent to the church. Other improvements, such as trails and picnic areas, will be great improvements to our City.

The City of Rancho Palos Verdes NEEDS this project. We sincerely hope you give your approval without delay.

Sincerely,  
Clayton G. Wannamaker  
Ann D. Wannamaker  
30316 Via Borica  
Rancho Palos Verdes, CA 90275

238A

Janet L.B. Watters

RECEIVED

March 30, 2001

APR 03 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Rancho Palos Verdes City Council  
Planning Commissioners  
Dept. of Planning, Building, and Code Enforcement  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Dear Planning Commissioners:

It is my understanding that there is an 11-acre site near the "Lower Point Vicente Area" that might accommodate a regulation size softball complex. As you are no doubt aware, the Palos Verdes Peninsula Girls Softball League Board has been looking for just such a site for some time. What a wonderful opportunity it would be for the girls on the Peninsula to have their own softball complex. My daughter has played in the League for four years and we have always thought it would be of benefit to the League to have its own complex, much like the Little League complexes that are scattered throughout the Peninsula.

I certainly support the Long Point project, which would improve public access to the beautiful bluffs and shore area. The City of Rancho Palos Verdes would certainly benefit from the increased tax base that the Long Point project would provide. How nice it would be to see a beautifully maintained resort at the old Marineland site, which is such an eye-sore. I am all for the additional picnic areas and parkland that the developer of the resort would create on city land.

The young girls of this community are eager to have their voices heard. Their hopes (and the hopes of their families who come out to cheer the girls on at the softball games) of having a softball complex that they can all be proud to utilize could become a reality if the Long Point Resort project is approved. I urge you to favorably consider the request recently made by Juan Torres, President of the Palos Verdes Peninsula Girls Softball League, for the planning commission to consider a recreational complex, such as a softball complex, to be developed on the Lower Point Vicente Area.

Thank you for your time and consideration.

Sincerely,

Janet L. B. Watters



239A

MAY 14 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

DEAR MAYOR LYON

cc force

MEMBERS OF THE CITY COUNSEL  
AND PLANNING COMMISSION CITY OF R P V  
PLEASE HELP ALONG THAT THE LONG PONT  
RESORT FINALLY WILL GET UNDERWAY  
WITH BEUG BUILD. THIS PROJECT WILL BE  
SUCH AN OVERWHELMING GAIN TO OUR CITY!  
NOT ONLY WILL IT BEAUTIFY BUT IT WILL  
BRING MUCH NEEDED HELP. SO, ANYBODY  
WITH AN EYE FOR BEAUTY AND A SOBS FOR  
BUSINESS SHOULD WELCOME THIS PROJECT  
TOO LONG HAVE THESE BAD LOOKING AND  
UNDEVELOPED AERES OF FORMELY MARINELAND  
BEEN A EYSORE FOR EVERYBODY,  
CITIZENS AND GUESTS WE WAND TO BE  
PROUD OF OUR CITY AND THIS WILL BE  
A WELCOME ADDITION.  
PLEASE MAK IT HAPPEN SOON

240A

THANK YOU

JAKOB WERSCHING

30772 VIA LA CRESTA

R P V

MARCH 9 / 2001

Les Evans, 09:50 AM 4/3/01 -0700, Fwd: City Hall Area Development

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 03 Apr 2001 09:50:33 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: City Hall Area Development

Date: Mon, 02 Apr 2001 21:05:05 -0700  
From: John Wessel <wesselj@home.com>  
User-Agent: Mozilla/5.0 (Windows; U; Win98; en-US; m18) Gecko/20010131 Netscape6/6.01  
X-Accept-Language: en  
To: CityCouncil@RPV.com  
Subject: City Hall Area Development

John Wessel  
30539 Rhone Dr.  
Rancho Palos Verdes, CA 90275  
April 2, 2001

Honorable City Council Members:

I would like to commend your efforts to secure permanent undeveloped open spaces in the coastline area. Acquisition of the Portuguese Bend area is highly encouraged as a means to protect the unique natural environment that characterizes our city.

I regard plans for Long Point development as an integral component of open space preservation and restoration needs. Extension of resort related development into city-owned open space is inconsistent with the need for restoration of the natural environment in the area. Development in the form of a golf course or sports facility will not be in the long range interest of the city.

I recommend that the city consider the recommendations and support offered by public interest groups including Save Our Coastline II, the Palos Verdes Peninsula Conservancy, and the Audubon Society regarding preservation of the area adjacent to city hall.

Sincerely yours,

John Wessel

241A

**Carolynn Petru, 02:05 PM 4/3/01 -0700, Re: Long Point**

---

X-Sender: Carolynn@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Tue, 03 Apr 2001 14:05:33 -0700  
To: "William S Wildman" <wswildman@west.raytheon.com>  
From: Carolynn Petru <carolynn@rpv.com>  
Subject: Re: Long Point

Dear Mr. Wildman -

Thank you for your message concerning the proposed Long Point project. I have forwarded you questions regarding the softball facilities to David Snow, Deputy Planning Director, who is the project manager for the Long Point project.

Sincerely,

Carolynn Petru  
Assistant City Manager

At 01:29 PM 4/3/01 -0700, you wrote:

I have a few questions about the project.

Why is the softball field missing from the site plan on the long point web site?

I am aware of the cost for removal of top soil. The developers would "contribute to the development of the Softball field". Who pays for the rest? Would they pay for all of the development?

Thank You  
Scott Wildman (softball dad)  
310 647-4877

**242A**

**GREGG & JEANNE WILLARD**

1416 VIA ANDRES PALOS VERDES ESTATES, CA 90274 • 310-544-2313 • EMAIL:GENIE7777@AOL.COM

March 28, 2001

Mayor Lyon, Member of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd  
Rancho Palos Verdes, Ca 90275

Re: Long Point Resort

Dear Mayor:

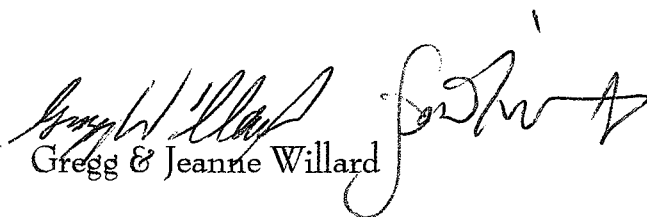
We are writing in regards to the Long Point project. It is our understanding that the developers have reached out to the community and are willing to contribute to the development of a recreational facility that would benefit our children.

The PVPGSL has proposed that this site include a **softball complex**. What a great addition this would be to our community. For years our daughters have had to play on undersized and poorly maintained fields that are not always available. It is time to bring our softball facilities up to par with baseball.

**243A**

If this proposal includes a softball complex, we strongly support it. This would allow a development that will benefit both the adults and children of the community.

Sincerely,

  
Gregg & Jeanne Willard

cc: Long Point Resort

Mrs. J. M. Woodcock  
32859 Seagate Drive, Palos Verdes Peninsula, Calif. 90274

RECEIVED

Mayor Lyon  
City Council  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

MAR 26 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Dear Mayor Lyon,

The attached Message Points from Long Point Resort exactly reflect my husbands and my views on the Long Point property, and have been our views since the development was proposed!!!!

I sincerely hope that all efforts to see this project succeed will be taken.

Any supportive letters needed in the future, please contact me.

Mrs. J.M. Woodcock

244A

# THE LONG POINT RESORT

## *MESSAGE POINTS*

- ♦ The old Marineland property, scarred by the remnants of buildings and vast areas of asphalt parking lots, is certainly not an asset to the RPV community. Now, we have an opportunity to do something about this eyesore. That opportunity is the Long Point Resort. It's going to be a class act, given that the Resort will be developed and operated by the same folks who are managing world-class resorts like the Hotel del Coronado in San Diego and the L'Auberge Del Mar Resort in Del Mar. As to the Marineland property, opportunities have been lost in the past. Let's not blow this one.
- ♦ At long last, we'll have a top-notch facility here in RPV where the community can hold events such as high school proms and the Main Event...a place where I can take my family for brunch overlooking the ocean...where I can attend an anniversary celebration or meet with my club. That's what the Long Point Resort offers. For years we've had to drive out of the area for these services. Now, we'll have what we need, right here in our own backyard.
- ♦ Some people object to any portion of the Resort project being placed on publicly owned land. I disagree. The property near City Hall is just sitting there - generally not being used by the public. As a result of the Long Point Resort, this area will be opened up for the enjoyment of the entire community. The city is not currently in a position, fiscally, to provide improvements to this property -- improvements that will benefit the community. The developer of the Long Point Resort is. New public trails, picnic areas and parkland will be created on this land, which will be built by the developer but owned by the city. And, the natural habitat will be protected and increased. This is certainly a good deal for the public and the public is us.
- ♦ I think there's a lot of sentiment in town that the utility tax should be abolished. The issue is -- how would that revenue, needed to fund important city services, be replaced. There have been very few new tax sources in RPV recently. Now, the Long Point Resort project is a very real possibility. An economic study requested by the city indicates that the Resort will generate about \$4.5 million in tax revenues to the city annually. This would boost current revenues by more than 50%. These dollars could be used to do away with the utility tax, clean up Hawthorne Blvd. or other main arterioles, and/or fund new services or even, perhaps, be used to underground our utility lines. This is good news.



- ✦ All of us who like to hike, pedal or walk should get behind the Long Point Resort proposal. Just think -- eleven miles of new pedestrian and bicycle trails will be created as part of this project -- all at the expense of the developer. Included is a new public trail located along the bluffs at Long Point that connects with other existing and new trails to the east and west. And, two public walkways from the bluffs to the shore will be improved -- one of which will be accessible to those who are physically challenged.
- ✦ The 5 new public parks and scenic viewpoints that will be included in the Long Point project are a real plus. So are the new parking spaces for the public that will be added to the Fishing Access area, adjacent to the new bluff-top park, to be built by the developer. And, there will be more general public parking added in the Resort hotel area.
- ✦ I understand that existing wildlife habitat areas will be protected and new habitat added as a result of this project. Some 30 acres -- all at no cost to the city. The protection of the face of the bluffs and native plants in the area is very important. I'm glad that the Long Point Resort developers understand this and have designed a plan that does so.
- ✦ A few people argue that none of the Long Point golf course holes should be put on city-owned property. Well, there is simply not enough room on the Long Point site to accommodate the hotel, related facilities and 9 holes of golf. If there is no golf course, the Resort can't fly. That's the lesson that has been learned by the developers of world-class resorts. So, of course, some of the holes should be placed near City Hall. Just think of all the benefits that the Resort will bring to the public. New public parks and trails. Improved pathways to the ocean. Picnic areas. A public golf practice facility and golf course. Jobs and tax revenue. It's a home run for the community.
- ✦ The developer of the Long Point Resort has done his homework. Considerable time and effort has been spent reaching out to the community for suggestions and comments about the proposed project. As a result of input from the community, the plans for the Resort have been substantially modified. The initial plan called for an 18-hole golf course. However, members of the community objected to golf holes being placed near the Interpretive Center and the area north of there. So, the developer reduced the golf course from 18 to 9 holes. Others in the community expressed concern about private residences being a part of the Resort. The developer dropped those plans. And, there were many other changes made in the design of the project, which has resulted in better access to the shore and improved and new trails. Now a good project is a great project. Let's get behind it, not meddle with it.

**Les Evans, 01:33 PM 4/4/01 -0700, Fwd: Long Point Resort**

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Wed, 04 Apr 2001 13:33:49 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: Long Point Resort

X-Server-Uid: beeacd1c-5d95-11d4-829d-00508b666b38  
From: "Wright, Otis D. II" <WrightO@wemed.com>  
To: "'CityCouncil@rpv.com'" <CityCouncil@rpv.com>  
Subject: Long Point Resort  
Date: Wed, 4 Apr 2001 14:36:56 -0400  
X-Mailer: Internet Mail Service (5.5.2653.19)  
X-WSS-ID: 16D5B5B825419-01-02

As a 20 year resident of RPV I am writing to voice my strong support for the Long Point Resort project planned for the old Marineland property. Aesthetics aside, and the now vacant Marineland property is indeed an eyesore, the projected tax revenues to the City are considerable. It is my understanding that a request has been made to locate a portion of an 18 hole golf course on city property near City Hall. Considering the current condition of that property, would not a golf course be a monumental improvement to the appearance of the locale? Would not the entire project be an immeasurable improvement to the landscape, and enhance the prestige of the community and the quality of life of those of us who live here? Please don't blow this opportunity.

Otis D. Wright, II

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP (WEMED), please see our website at [www.wemed.com](http://www.wemed.com) or refer to any WEMED office. Thank you.

**245A**

Jswuerker@aol.com, 03:28 PM 3/10/01 -0500, Upper Point Vicente Park

---

From: Jswuerker@aol.com  
Date: Sat, 10 Mar 2001 15:28:04 EST  
Subject: Upper Point Vicente Park  
To: finance@rpv.com  
X-Mailer: AOL 4.0 for Windows 95 sub 122

Dear Mr. Butler and Members of the Finance Committee:

Having called the Peninsula home for more than 50 years, I still view it as a geographical, if not political, entity. The advantages of retained open space have accrued to all of us over that entire period of time, not only in our very high property values but in the improved quality of life they offer. The high property values are the basis of the main revenues that come to each of our cities and should be a serious factor in your recommendations. They are bound to be affected if the unique ambience of the Peninsula is diminished.

As a resident of Palos Verdes Estates, I worked hard for the establishment of your city and was thrilled when the former Nike site was deeded to your control. To take it away from all of us to give to a developer for questionable financial gain would not only be unfortunate. It would be ludicrous.

It is obvious from the continued withholding of the basis for their proposed potential revenues, that Destination Resorts is grossly exaggerating the amounts the City would receive. What is their assumed percentage of occupancy? What are the rates they assume the market will bear? What amenities will they have for non-golfers? We are being asked to buy a pig in a poke.

If PVE officials were to find a way to set aside the powers of the Homes Association and to consider allowing our parklands to be developed, they would either be tarred and feathered or laughed out of town. We prize our parklands and would never consider trading them for additional revenue for our city.

I hope that you will recommend to the RPV City Council that, whatever the projected revenues are from including Point Vicente Park in the Long Point Project, they not trade our enjoyment of the Park for them.

Thank you for serving on the Finance Committee.

Very sincerely,  
Scotty Wuerker

246A

April 5, 2001

Planning Commission  
 City of Rancho Palos Verdes  
 30940 Hawthorne Blvd.  
 Rancho Palos Verdes  
 California 90275

RECEIVED

APR 06 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENT

Subject: Draft Environmental Impact Report

With the Proposed Project having the advantage, not only of authorship but the ability to include 5 variations on its theme, there are difficulties in making comparisons. From time to time, representatives of the Project have indicated favoring one or the other variation, again making it difficult to know just which shell conceals the pea. Nevertheless, a number of inconsistencies and erroneous conclusions are evident.

247A

The description of the "No Project" Alternative matches that of the already approved project on the Long Point property often identified as the Monahan Plan. It would be less misleading to call it the Existing Project.

Table 7-1, the Comparison of Alternatives clearly indicates that the Pt. Vicente Park Enhancement Alternative provides the least environmental impact. In 12 of the 13 areas, it is rated as providing less impact than the Proposed Project. Only in the 13<sup>th</sup>, does it provide the same impact. The No Resort Villas - Option B Alternative provides the same impact as the Proposed Project in 11 areas and only in 2 does it provide less. How then, can it be concluded (in 7.10) that "Among the other alternatives assessed in this EIR, the No Resort Villas - option B Alternative would be considered the environmentally superior alternative. This is based on this Alternative's ability to reduce the significance of impacts on Biological Resources." This "ability" is not cited or quantified nor is it reflected in the ratings given in Table 7-1.

247B

7.10 goes on to state, "Further, it should be noted that this alternative would attain all of the objectives cited for the Proposed Project." Since when is the the goal of a city to assist a developer in attaining all of his objectives?

247C

On July 10, 2000, Mr. Mohler of Destination Development Corporation spoke of 700 full-time equivalent employees. In 6.3, it states that in 1989, "the existing entitlement was estimated to generate 1500 employees, which would more than double the employment anticipated with the current proposal". The two figures are not comparable and the conclusion is completely wrong. For example, I managed 38 employees who represented 7 full-time equivalents. Perhaps this conclusion is representative of the incorrect data considered in deciding that the RHA would have "more intensive use" under the No Project Alternative than the Proposed Project.

247D

Another questionable set of data related to this conclusion are stated in 7-11, Air Quality. It says, "Emissions from stationary and mobile sources associated with this {No Project} alternative would be slightly greater than the Proposed Project overall due to a more intense development and a greater volume of average daily traffic". With 32 less building units and, therefore, fewer guests?

247E

The DEIR cites 9619 average daily trips for the smaller No Project and 6263 for the Proposed Project. Irrational.

3-15 mentions that, in addition to the 100 parking spaces on the RHA, there would be 825 new visitor serving parking spaces. Do these include the parking for the 700 employees on the UPVA? Since the land use map (3-15) depicts parks and parking as the same, it is not clear where these will be located.

247F

The Long Point Habitat Conservation Plan is not identified or defined although it is cited throughout the DEIR. What is it? Has it been written? Will it be approved by the City? Monitored?

247G

5.7d describes procedures for groundwater monitoring wells. If it is determined that more are needed, who will pay for them?

247H

Since the City retains ownership of UPVA, is it liable for damage or injury to visitors, neighbors? Golf safety precautions appear to be completely inadequate, especially for Via Capri residents.

247I

In 7-12, it is stated, "Similarly, the Proposed Project is not anticipated to conflict with the policies of the City of RPV General Plan, Coastal Specific Plan and Development Code." Table 3-3, Discretionary Actions, lists 8 separate actions that would be required by the City Council if the Project goes forward. They include amendments to the General Plan, the Coastal Specific Plan and zoning changes. It's a little like saying "I wouldn't be breaking the law if you'd just change the law!"

247J

The Mitigation Measures, in the few areas where they are considered needed, appear to be optional in some cases since the Applicant may request a Conditional Use Permit which permits noncompliance.

247K

In addition to the assumption that future Commissions and Councils will accede to the demands of the Applicant, there is great hubris in the statement that (5.7-5), "An amendment to the Program of Utilization shall be prepared to concur with the uses proposed for the UPVA by the Long Point Resort Project. Approval of the Amendment to the POU shall be obtained in writing from the Department of the Interior prior to Grading Permit issuance." This agreement has been honored over 25 years by many councilmembers. It may not be so easily dismissed.

247L

While the protests of many residents are included in the Appendices, they are not acknowledged in the analysis. Since the DEIR includes public parkland, it would be appropriate to have this factor given more consideration.

247M

On the basis of the information contained, and omitted, from the DEIR, the Proposed Project should be rejected.

247N

Sincerely,

Scotty Wuerker, Member  
SOC II Steering Committee  
cc: City Council

**Les Evans, 12:05 PM 2/26/01 -0800, Fwd: Objection to the use of public land for private golf**

---

X-Sender: LesE@207.238.114.197  
 X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
 Date: Mon, 26 Feb 2001 12:05:00 -0800  
 To: davids@rpv.com  
 From: Les Evans <lese@rpv.com>  
 Subject: Fwd: Objection to the use of public land for private golf course

Reply-To: "Akemichi Yamada" <akemichi.yamada@worldnet.att.net>  
 From: "Akemichi Yamada" <akemichi.yamada@worldnet.att.net>  
 To: "Public Works, RPV" <publicworks@rpv.com>,  
 "City Manager, RPV" <citymanager@rpv.com>,  
 "City Council, RPV" <CityCouncil@rpv.com>  
 Cc: "John Bogert at Daily Breeze" <john.bogert@dailybreeze.com>  
 Subject: Objection to the use of public land for private golf course  
 Date: Mon, 26 Feb 2001 11:45:05 -0800  
 X-Mailer: Microsoft Outlook Express 5.00.3018.1300

Dear Sirs:

I would like to convey my feeling against letting a private developer converting a portion of the public land for a golf course (as part of developing the old Marine Land).

I believe that a scarce public land should be protected for use by all of our citizens. It saddens me to hear that our city officials are even contemplating about an option for letting a private developer use a portion of the public land for a private enterprise.

It seems that the only reason why such issue even comes up is that some of elected city officials and high ranking city employees are more concerned about increasing revenues (into the city treasury from tax on the private enterprise) than the general public interest.

If the key consideration is not on the potential revenue, then the answer to whether the public land should be used for the private enterprise should be a strong NO.

The proposed use of the public land for a golf course is so absurd. It only benefits wealthy golfers.

Children of our city will be deprived of opportunities to explore natural habitat.

I simply wish that our city planning officials (especially in the City Planning Dept. and Parks/Recreation Dept) come up with a low cost approach to making the land accessible to our children to explore the natural habitat.

Please do not turn it into an overly developed park like the Hesse Park. We just need narrow dirt trails that would alter minimally the natural habitat.

**248A**

This should not cost much to develop or maintain.

**248A**

Sincerely,  
A. Yamada  
6320 Rio Linda Dr.  
Rancho Palos Verdes, CA 90275

J for  
cc # saved

March 10, RECEIVED

MAR 14 2001

PLANNING, BUILDING,  
& CODE ENFORCEMENTMayor Lyon, Members of the City Council + Planning  
Commission

After carefully studying the information on the Long Point Resort, I am strongly in favor of the Resort being built. It will not only benefit the city economically but will greatly benefit the RPV community with its facilities, Parks and Trails.

249A

Sincerely,  
Alice S. Young  
12 Mela Lane  
Rancho Palos Verdes



Les Evans, 08:01 AM 4/2/01 -0700, Fwd: The Long Point Resort

---

X-Sender: LesE@207.238.114.197  
X-Mailer: QUALCOMM Windows Eudora Version 5.0.2  
Date: Mon, 02 Apr 2001 08:01:01 -0700  
To: davids@rpv.com  
From: Les Evans <lese@rpv.com>  
Subject: Fwd: The Long Point Resort

From: "Doug Young" <youngpve@home.com>  
To: <CityCouncil@rpv.com>  
Subject: The Long Point Resort  
Date: Sun, 1 Apr 2001 11:39:16 -0700  
X-Mailer: Microsoft Outlook Express 5.00.2919.6600

Dear Mayor and Members of the City Council and Planning Commissioners:

Attached please find my letter of support the softball complex to be included as part of the Long Point Resort.

Thank you, Douglas Young.



PVGSL.doc

250A

March 31, 2001

Mayor Lyon, Members of the City Council and Planning Commission  
City of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

Re: The Long Point Resort

Dear Mayor and Members of the City Council and Planning Commissioners:

As a member of the community and participant in the Palos Verdes Girls Softball League (PVGSL) for the last five years, this letter serves as my voice of support for the proposed development known as "the Long Point Resort Project." While the project as a whole appears to have many beneficial attributes to the community, I would like to make you aware of my full support of the softball complex that would be included along with the resort and golf course.

The PVGSL has played an important role in the maturational development of my daughter and given my family a chance to become friends with neighbors that we would not have met without the league. I have found the league to be run very well by the PVGSL Board and continues to provide both a positive social and competitive environment for girls.

Unfortunately, the PVGSL does not have a complex that supports the types of activities needed to continue and expand the organization. All of the fields used for PVGSL games and practices are shared, found in various locations throughout the community, and are constrained by other events and activities beyond the control of the PVGSL Board. Further, there is no facility that affords the capability to host tournaments and events that would, in turn, help support the league. For these reasons, we would like to see the Long Point Resort as the site for PVGSL.

Thank you for considering our request for the development of a much needed recreation facility that will benefit the community and our children.

Respectfully,

Douglas Young  
1632 Chelsea Road  
PVE, CA 90274

jill\_zachman@Toyota.com, 04:32 PM 3/29/01 -0800, Your comments were submitted to Rancho Palo

From: jill\_zachman@Toyota.com  
 Date: Thu, 29 Mar 2001 16:32:37 -0800  
 Subject: Your comments were submitted to Rancho Palos Verdes City Hall.  
 To: planning@rpv.com

=====

Confirmation of Your Service Request, Inquiry or Comment

=====

The following Information was submitted to Rancho Palos Verdes City Hall:

=====

Your Information

=====

Name:  
     jill zachman  
 Address:  
     100 vanderlip dr.  
 City:  
     RPV  
 Home Phone Number:  
     310-377-0241  
 Office/Other Phone Number:  
     310-468-4481  
 E-mail Address:  
     jill\_zachman@Toyota.com

=====

Contact Instructions

=====

Where we can contact you should questions arise:  
     Office/Other  
 Should we inform you of the action taken?:  
     Yes Contact me through e-mail

=====

Information about Your Service Request, Inquiry or Comment

=====

Location or Address of Service Request, Inquiry or Comment:  
     City Council and Planning Commission

Describe the Service Request, Inquiry or Comment:  
     Regarding Long Point EIR:

As a resident and consistent voter, I do not support the use of City land for a golf course. It should be maintained as Open Space.

251A

=====  
Thank You for your Comments.  
=====

We have received your email and thank you for taking time to contact us. If you have requested City staff to contact you, we will do so within 24 hours of receiving your message. The exact timing of our reply will depend on the nature of your email, as well as how you have asked us to reply. If you have additional questions or concerns, please feel free to contact us again. Your input and feedback is important to us and helps us to improve our service to the community.

**251A**

March 23, 2001

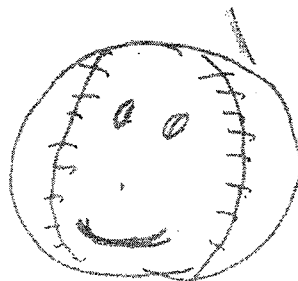
Dear Mayor Lyon,

I am 11, and I play girls softball. Our softball fields are too small for the older girls to play on. Please, please help us find more and larger fields to play on. Thanks you for all your help.

252A

Your softball player,  
Erika Zambello

34 Empty Saddle Lane  
Rolling Hills Estates CA,  
90274



Dear Mayor Lyon,

I am 11 ~~years~~ old. I have play base ball for 4 years.  
Every year we need more ~~fields~~ to play on. I hope you  
will help us build ~~knew~~ ~~fields~~ so more girls can play.

253A

From, Elizabeth Zevin 26800 S. Academy Dr.  
#53  
Palos Verdes CA 90274

P.S. Help us please

**MARCH 13, 2001**  
**ORAL PUBLIC HEARING**  
**COMMENTS**

## **COMMENT NOS. 254 THROUGH 293**

These comments consist of the Oral Comments submitted on the March 13, 2001 Public Hearing.



**MARCH 26, 2001**  
**ORAL TRAFFIC**  
**COMMITTEE MEETING**  
**COMMENTS**

## **COMMENT NOS. 294 THROUGH 312**

These comments consist of the Oral Comments submitted on the March 26, 2001 Traffic Committee Meeting.

**COMMENTS RECEIVED  
AFTER CLOSE OF  
PUBLIC REVIEW PERIOD**

## **COMMENT NOS. 313 THROUGH 316**

Refer to the *Responses to Public Agencies* Section of this document.

**RESPONSE TO  
PUBLIC AGENCY  
COMMENTS**

## RESPONSES TO PUBLIC AGENCIES

### Response to Comment No. 1

Angela Brinkmann Busi, Conservation Chair  
California Native Plant Society, South Coast Chapter  
April 5, 2001

- 1A. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 1B. It should be noted that the Alternative identified by the Applicant as their preferred Alternative was analyzed in Draft EIR Section 7.5, *Relocate Practice Facility - Option "B" Alternative*. As noted in this comment, the Project Applicant intends to modify its applications to reflect as the preferred project a *refined* Alternative 7.5. This alternative was modified in an effort to reduce biological impacts and golf safety impacts in the Upper Point Vicente Area. In summary, refinements to this Alternative include the following:
- increased separation between the golf course and St. Paul's Lutheran Church;
  - revised outline of Hole No. 3 to avoid the mixed sage scrub habitat in the northeastern corner of the Upper Point Vicente Area; and
  - revised outline of driving range.

Accordingly, Section 7.5 of the Draft EIR has been revised in the Final EIR to reflect these modifications (refer to Volume I, *Final EIR*). Further, it should be noted that a detailed evaluation of the Biological impacts associated with Alternative 7.5 has been conducted by Bonterra Consulting and included in Section 7.5. Also included in Section 7.5 is a detailed evaluation of the golf safety impacts conducted by Kipp Schulties Golf Design, Inc.

It should be noted that Table 7-1 of the Draft EIR, *Comparison of Alternatives*, was not included in the Final EIR since it was determined that the impact comparison to the proposed Project provided for each Alternative more adequately portrayed the Alternative's comparative merits.

- 1C. Alternative 7.7, *No Resort Villas - Option B*, has been compared to the proposed Project as defined in Section 3, *Project Description*, and not to the preferred alternative (Alternative 7.5, *Relocate Practice Center - Option B*).

Page 7-30 of the Draft EIR has been revised in the Final EIR as follows:

The "No Resort Villas - Option B" Alternative would exclude the Resort Villas proposed for development in the northeastern portion of the RHA (refer to Exhibit 7-5, *No Resort Villas - Option B Alternative*). ~~The golf practice facility would be "switched" with Hole 8, relocated from the UPVA to the eastern~~

portion of the RHA and it would be replaced by relocating Hole 8 to the UPVA vacated by the practice facility. Hole 7 would be relocated to the area vacated by the Resort Villas. The area vacated by the Resort Villas would be replaced by Hole No. 8. The area vacated by Hole No. 8 would be replaced by the golf practice facility. A portion of the area vacated by the golf practice facility would be replaced by Hole No. 3. The portion of the UPVA vacated by the golf practice facility not used for a golf hole Hole No. 3 would be used for the creation of new habitat, creating a larger conservation zone in the northwestern portion of the UPVA.

Page 7-32 of the Draft EIR has been revised in the Final EIR as follows:

The UPVA portion of the golf course would be modified: a golf hole and the practice facility would be relocated to the RHA. The area vacated by the practice facility would be replaced by another golf hole with a modified golf course design. The area vacated by relocation of the golf hole to the RHA presently consists of agricultural lands.

Relocation of this golf hole would facilitate the creation of new habitat, creating a larger conservation zone in the southeastern corner of the UPVA. This would represent an enhancement to the proposed Project's Long Point Habitat Conservation Program increasing the total proposed habitat of 40 acres to approximately 46 acres. Further, since the relocation sites for the golf hole and practice facility proposed with this alternative presently contain developed lands and disturbed habitats, significant biological impacts are not anticipated to occur with this alternative.

As illustrated in Exhibit 5.3-2, *Biological Resources Within Upper Point Vicente Area*, the portion of the UPVA vacated by relocation of the practice facility to the RHA presently consists of annual grasslands and Chenopod Scrub.

When compared to the proposed Project, relocation of the practice facility would facilitate the creation of generally an equal amount of conservation area in the UPVA (approximately 40 acres), although reconfigured. However, it should be noted that Hole No. 3 as proposed with this Alternative would extend into the mixed sage scrub habitat (and location of *Dudleya virens*) identified in the northeast corner of the UPVA. Therefore, implementation of this Alternative would result in greater impacts to biological resources than the proposed Project.

Since it has been determined that Alternative 7.7 would result in greater biological impacts than the proposed Project, the Environmentally Superior Alternative discussion on Page 7-46 of the Draft EIR has been revised in the Final EIR.

Also, refer to Response to Comment No. 1B regarding Table 7-1.

- 1D. Alternative 7.9, *Point Vicente Park Enhancement Alternative*, does not involve the development of a resort hotel on the RHA therefore, would not fulfill the objectives noted in this comment of establishing a destination coastal resort or improving water quality through construction and implementation of a Runoff Management/Water Quality Management Plan. This would be consistent with CEQA Guidelines Section 15126.6(c) which state the following:

*“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts. [Emphasis added.]”*

Refer also to Response to Comment No. 1C.

- 1E. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 1F. Pursuant to CEQA Guidelines Section 15126.6(f)(2)(A), “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR”. Alternative 7.4, *Relocate Practice Facility - Option “A” Alternative*, was presented due to it’s ability to reduce the significance of impacts on Biological Resources.
- 1G. Refer to Response to Comment No. 1D. Additionally, Section 7.0, *Alternatives to The Proposed Project*, has been expanded to include Alternative 7.10, *Point Vicente Park Enhancement and Existing Entitlement Alternative*.

Page 7-3 of the Draft EIR has been revised in the Final EIR as follows:

These alternatives include: 1) No Development Alternative; 2) No . . . 8) Program of Utilization Alternative; and 9) Point Vicente Park Enhancement Alternative - ; and **Alternative 10) Point Vicente Park Enhancement and Existing Entitlement Alternative.** Refer to. . . .

Also, refer to Response to Comment No. 1B regarding Table 7-1.

Page 7-46 of the Draft EIR has been revised in the Final EIR to include Alternative 7.10, *Point Vicente Park Enhancement and Existing Entitlement Alternative*. Refer to Volume I, *Final EIR*.



The sub-title on Page 7-46 of the Draft EIR has been revised in the Final EIR as follows:

## ~~7.10~~ **7.11 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 1H. Comment is noted. *Centromadia* is the current taxonomy for the previous *Hemizonia* species (Novon 9:462-471[1999]) as cited in the CNPS 2000 Electronic Inventory. Minor typographical errors can occur during the preparation of an EIR due to erroneous corrections made during a “spellcheck” by the computer and/or simple human oversight. Minor typographical errors in an EIR do not render an EIR inadequate.

Page 5.3-13, Table 5.3-2, *Special Status Plant Species Potentially Occurring Within the Project Region*, and Page 5.3-22 of the Draft EIR are revised to reflect the correct spelling of *Aphanisma blitoides* (refer to Volume IV, *Revised Biological Resources Section*).

Pages 5.3-2 and 5.3-26, and Page 5.3-15, Table 5.3-3, *Special Status Wildlife Species Potentially Occurring Within the Project Region*, of the Draft EIR have been revised to reflect the correct spelling of *Glauconyctes lygdamus palosverdesensis* (refer to Volume IV, *Revised Biological Resources Section*).

Pages 5.3-2 and 5.3-26 of the Draft EIR have been revised to reflect the correct plant which is associated with the El Segundo blue butterfly (*Euphilotes battoides allyni*): coast buckwheat (*Eriogonum parvifolium*) (refer to Volume IV, *Revised Biological Resources Section*). Additionally, the discussion regarding this issue has been revised.

A list of the plant species observed on the Project site during the verification surveys conducted by BonTerra Consulting on August 22 and September 1, 2000, focused special status plant surveys conducted by Dudek & Associates in 1998, and butterfly host plant surveys conducted by Dudek & Associates on June 15, 1999 has been included in Appendix 15.3 of the Final EIR, *Biological Resources*. In addition, a list of wildlife species observed or expected to occur onsite has also been incorporated.

- 1I. The Plant Palette of the LPHCP was not prepared by the preparers of the Draft EIR. As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant palette would only include locally appropriate native species.

Mitigation Measures 5.3-2c, 2d, and 2e provide for the fencing, signage, and protection of the natural areas within the Project site. In addition, Mitigation Measure 5.3-2i includes the development of a detailed revegetation program. Components of the revegetation plans include the maintenance plan and monitoring guidelines that would detail the restrictions on (1) excessive watering, (2) use of fertilizers/pesticides/and herbicides, and (3) maintenance activity. Page 5.3-69, Mitigation Measure 5.3-2i, of the Draft EIR has been revised to provide additional detail of the sage scrub mitigation program (refer to Volume IV, *Revised Biological Resources Section*).

Page 5.3-67 of the Draft EIR, Mitigation Measure 5.3-2a, has been revised to reduce the potential for non-native plants to invade the natural open space on the Project site (refer to Volume IV, *Revised Biological Resources Section*).

- 1J. As stated in the Survey Methodologies Section under 5.3 Biological Resources, the surveys that were conducted by BonTerra Consulting in September 2000 were not considered focused special status plant surveys but rather general reconnaissance field surveys to review and verify the information previously prepared for the Project site by Dudek & Associates.

A separate plant survey report was not prepared by Dudek & Associates for the spring 1998 focused plant surveys, but rather the information was summarized in the Draft Biological Resources Report and Impact Assessment for Long Point Specific Plan Rancho Palos Verdes, California prepared by Dudek & Associates in September 1999 for the City of Rancho Palos Verdes.

The Catalina mariposa lily was not observed during focused surveys on the Project site. Please note that this lily is listed as a CNPS List 4 species. List 4 species are considered relatively common in the region and impacts on this species are not considered significant based on the significance criteria outlined in the CEQA Guidelines.

The reports prepared by Dudek and Associates have been included in the Appendix to Volume IV, *Revised Biological Resources Section*. It should be noted, however, that these reports contain outdated information and have been superseded by the report and surveys conducted by BonTerra Consulting.

- 1K. The comment is noted on the error made regarding the reference to ashy-leaf buckwheat (*Eriogonum cinereum*) rather than the correct species coast buckwheat (*Eriogonum parvifolium*).

Pages 5.3-2 and 5.3-26 of the Draft EIR have been revised to reflect the correct spelling of *Glaucopsyche lygdamus palosverdesensis*, and the correct plant which is associated with the El Segundo blue butterfly (*Euphilotes battoides allyni*): coast buckwheat (*Eriogonum parvifolium*) (refer to Volume IV, *Revised Biological*

*Resources Section*). Additionally, the discussion regarding this issue has been revised.

It should be noted that focused surveys for the El Segundo blue (*Euphilotes battoides allyni*) to determine this species presence/absence from the site are currently in progress. Survey results shall be incorporated into Volume IV, *Revised Biological Resources Section*, upon completion of the survey effort.

- 1L. Comment is noted. These species do have a limited potential to occur on the Project site. During a search of the California Native Plant Society Electronic Inventory and the California Natural Diversity Database records, *Calandrinia maritima*, *Calystegia peirsonii*, and *Dichondra occidentalis* in the Project vicinity were not found. These species were not observed during previous focused surveys on the Project site by Dudek & Associates. All of these species are CNPS List 4 plants, which include those species of limited distribution in California whose susceptibility to threat appears low at this time. Potential impacts on these species by the proposed Project would be considered less than significant because these species are considered relatively common in the region. In addition, these species do not meet the criteria in the definition of Rare or Endangered in the CEQA Guidelines.
- 1M. As stated in the Survey Methodologies section under 5.3, *Biological Resources* of the Draft EIR, the surveys that were conducted by BonTerra Consulting were not considered focused special status plant surveys but rather general reconnaissance field surveys to review and verify the information previously prepared for the Project site by Dudek & Associates. Dudek & Associates conducted focused special status plant surveys in 1998. According to the Dudek report, reasonably intact habitats on the site were surveyed during a period when most, if not all, of the potentially-occurring special status plant species would be evident, if not blooming. Based on the Significance Criteria establish for this project pursuant to the CEQA Guidelines, an appropriate evaluation of potential impacts on special status plant species known to occur onsite or with a potential to occur onsite was prepared.

The documentation of the existing conditions on the Project site are accurate, thorough, and consistent with industry standards and documentation requirements of the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG).

- 1N. As defined in the document, wildlife corridors must “connect” habitat patches. The Draft EIR acknowledges the UPVA’s connection to the habitats to the east and the RHA’s to the east and west. However, direct connection on the UPVA to open space areas north and west are obstructed by Hawthorne Boulevard, Palos Verdes Drive West, and residential and commercial development. As a result, less mobile wildlife species would be limited in their ability to reach the open space areas to the north and west. More mobile species, such as birds, are less affected by these

obstructions and are expected to be able to reach the open space areas north and west of the site that provide suitable habitat for these species.

Regarding the comment that “wildlife crossings” occur onsite, please note that based on literature<sup>5</sup>, crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. Wildlife crossings are not present across Hawthorne Boulevard to the north of the UPVA or across Palos Verdes Drive to the west and south.

In regards to significant impacts on “important corridors”, Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section.

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<sup>5</sup>The definitions of wildlife movement terminology were generated from the following sources:

Bennett, A.F. *Habitat corridors and the conservation of small mammals in the fragmented forest environment. Landscape Ecol.* 4:109-122. 1990.

Farhig, L., and G. Merriam. 1985. Habitat patch connectivity and population survival. *Ecology* 66:1,792-1,768.

Harris, L. D., and P.B. Gallagher. 1989. *New Initiatives for Wildlife Conservation; The Need for Movement Corridors*. Pages 11-34 in G. Mackintosh, ed. *Preserving Communities and Corridors*. Defenders of Wildlife., Washington, D.C. 96pp.

MacArthur, R.H., and E.O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton University Press. Princeton, New Jersey.

Noss, R. F. 1983. *A Regional Landscape Approach to Maintain Diversity*. *BioScience* 33:700-706.

Simberloff, D., and J. Cox. 1987. *Consequences and Costs of Conservation Corridors*. *Conser. Biol.* 1:63-71.

Soule, M. E. *Viable Populations for Conservation*. Cambridge Univ. Press, New York, N.Y. 1987.

CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites.* Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation are discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

The proposed habitat preservation and restoration outlined above and illustrated on Page 5.3-4 of the Draft EIR increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant palette would only include locally appropriate native species. In regards to “wildlife movement”, the steep cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted. The Project design of the UPVA area has maintained a connection to the open space areas off-site. In addition, the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site. Refer to Response to Comment 1DD.

- 1O. The full extent of the open space on the RHA is illustrated on Exhibit 5.3-5, *Biological Resources Impacts Within the Resort Hotel Area*. All areas outside the impact area on the RHA and within the preserve area would be permanent open space. These areas include both the coastal bluff scrub and rocky shore/coastal bluff areas that provide a connection east and west of the UPVA along the cliffs.
- 1P. Page 5.3-65, Mitigation Measure 5.3-1b, of the Draft EIR has been revised to provide additional detail for the special status plant mitigation program (refer to Volume IV, *Revised Biological Resources Section*).
- 1Q. The Long Point Habitat and Conservation Program (LPHCP), which is incorporated into the Applicant’s Permit Documentation package (June 23, 2000), is a part of the public record for the Project and is available for review at the City of Rancho Palos Verdes. The June 23, 2000 LPHCP was summarized in the Draft EIR. Since the Draft EIR was completed, the LPHCP has been updated (June 27, 2001). The biological resources analysis has been revised to reflect the updated LPHCP (refer to Volume IV, *Revised Biological Resources Section*). Also, the updated LPHCP is included in the Appendix to Volume IV.

Page 5.3-69, Mitigation Measure 5.3-2i, of the Draft EIR has been revised to provide additional detail of the sage scrub mitigation program (refer to Volume IV, *Revised Biological Resources Section*).

The stated intent of the LPHCP is to ensure compliance with FESA and to be consistent with the City’s NCCP, when adopted. Any ground-disturbing activities affecting either areas occupied by the coastal California gnatcatcher or areas occupied by state- or federally-listed Threatened or Endangered species would require compliance with the FESA and/or CESA. This compliance would require the approval of the mitigation (including the LPHCP) for the proposed impact by the USFWS and/or CDFG.

Impacts to the gnatcatchers onsite were found to be significant under the CEQA Thresholds of Significance established for this Project. The proposed mitigation would mitigate impacts to a level of less than significant. The mitigation is consistent with the requirements of CEQA and similar to other mitigation strategies developed for projects which met the approval of the USFWS.

- 1R. Page 5.3-53 of the Draft EIR notes that impacts on scrub communities (which includes mixed coastal sage scrub, disturbed chenopod scrub, and southern cactus scrub) would be considered significant because this habitat type has been reduced up to 80 percent of its historic coverage throughout Southern California and the potential for this habitat to support special status species, especially the gnatcatcher. However, the Project Applicant has provided for enough mitigation in the LPHCP to mitigate for the areas impacted by this project. The LPHCP would be implemented to reduce all impacts to scrub communities to a level of less than significant.

Refer to Response to Comment No. 1B.

Pages 5.3-53 and 5.3-70 of the Draft EIR have been revised to reflect potential impacts associated with the new water, sewer and storm drain lines (refer to Volume IV, *Revised Biological Resources Section*).

- 1S. The Draft EIR does not state that the proposed Project would “be a better environment for the existing animals”. Regarding the “narrow strips of remaining habitat”, it is important to note that the current conditions onsite reflect relatively small, and or/narrow pieces of native habitat connected by non-native grassland, developed, disturbed, and agricultural areas. In several areas on Exhibit 5.3-4, the size of the preserved areas of coastal sage scrub, when combined with those areas of restoration, would increase and provide for a “scrub habitat” connection of the small scrub habitat patched that are currently present onsite. As designed and mitigated, the proposed Project would have a less than significant impact on wildlife species according to the significance criteria established for the project based on Section 15065(a) of the CEQA Guidelines.
- 1T. As stated on Page 5.3-59 of the Draft EIR, noise levels in the Project site would increase over present levels during construction of the proposed Project. During construction, temporary noise impacts have the potential to disrupt foraging, nesting, roosting, and denning activities for a variety of wildlife species. Because most species in the vicinity of the Project site are not listed as Threatened or Endangered by state or federal resource agencies, these impacts are not considered significant. However, the coastal California gnatcatcher, raptor species, and cliff nesting and roosting species (i.e., peregrine falcon, California gull, osprey, California brown pelican, and double-crested cormorant) either occur or potentially occur within proposed natural open space areas on the UPVA and RHA sites. These species would incur temporary short-term impacts from construction noise, if present in the vicinity of the Project site, and may be temporarily displaced due to

these disturbances. Indirect noise impacts on these species would be considered significant because these species are protected by federal and state wildlife agencies. Impacts on these species would be reduced to less than significant levels with implementation of the specified mitigation. Page 5.3-70, Mitigation Measure 5.3-2j, of the Draft EIR has been revised to include grading restrictions that are typically required by the U.S. Fish and Wildlife Service (refer to Volume IV, *Revised Biological Resources Section*).

Noise would also increase over present levels with implementation of the proposed Project resort and recreational uses. The Project site is currently periodically disturbed by noise: the RHA is currently used by the movie industry and the UPVA is located adjacent to the Rancho Palos Verdes City Hall. Further, Palos Verdes Drive South bisects the two Project areas (i.e., the UPVA and RHA). Although noise adjacent to the Project site would increase over current noise levels, and would become more constant, this increase would not be such that it would substantially reduce common wildlife populations in the region. Therefore, a significant impact is not anticipated in this regard.

Species that roost or nest along cliffs and the rocky shore of the proposed open space areas may be indirectly impacted by the increase in noise on the RHA. This impact would be potentially significant. Implementation of the specified mitigation requiring that a landscaping buffer be planted along the boundary of developed land uses would reduce this impact to less than significant. The landscape buffer would provide native and/or drought tolerant non-invasive plant species to reduce potential indirect effects on cliff/shore nesting species.

- 1U. No lighting is proposed for the golf course or practice facility. It should be noted that development of the practice facility building would necessitate interior lighting and limited exterior lighting. Analysis concluded that impacts associated with lighting are less than significant.

Page 5.1-24 of the Draft EIR has been revised in the Final EIR as follows:

No lighting of the golf course or practice facility is proposed or required. However, development of the practice facility building would necessitate interior lighting and limited exterior lighting including street lighting, building illumination and security lighting. The Applicant shall comply with City Development Code Section 17.56.040, *Outdoor Lighting for Non-Residential Uses*, which requires a Lighting Plan detailing the location, height, number of lights, wattage, estimates of maximum illumination on site and spill/glare at property lines. Compliance with the Development Code would reduce potential impacts to less than significant levels.



- 1V. It is anticipated that a split-rail fence or similar would be used to restrict human intrusion into the native habitat areas. These fences would be signed to prohibit human access into preserve areas. This type of fencing would not impede local wildlife movement onsite. Further, this type of fencing would not be of sufficient height to result in impacts to views across the site.
- 1W. Mitigation ratios for scrub communities are established on Page 5.3-66 of the Draft EIR. A mitigation ratio for any impacts to areas within the jurisdiction of the Army Corps of Engineers and/or California Department of Fish and Game has not been established; however, on Page 5.3-68 of the Draft EIR, the Mitigation Measures state that there would be “no net loss of habitat values”.

The general guidelines developed for the *Dudleya* mitigation are based on past professional experience and consultation with professional botanists and regulatory agency personnel. The establishment of special status plants directly on the mitigation site has been proven to be an effective and advisable program for some species. Depending on the number of individuals observed, the species ultimately collected on site for all special status plants, and current plant establishment techniques, other methods may be developed during the preparation of the Special Status Plant Mitigation Plan that best addresses the successful establishment of the species on the site.

- 1X. See Response to Comment No. 1P.
- 1Y. The commentor is implying that the term revegetation replaces the existing native vegetation. This implication is incorrect. As stated in the Draft EIR, “existing habitat (coastal bluff scrub areas) are proposed to be retained and, where appropriate, enhanced with new native vegetation.” It is an industry standard in native plant restoration/enhancement to use native plant material from local and/or regional origin.
- 1Z. Conservation easements are typically granted to the appropriate resource agency (either CDFG or USFWS) in perpetuity and are irrevocable. Since the majority of the habitat preservation areas lie on the UPVA, the City would have to consent to the grant of such a conservation easement on UPVA since it would permanently restrict the uses of the park. Additionally, the City and the Developer would need to enter into a separate agreement to ensure that the Developer assumes the costs associated with the maintenance of the habitat conservation areas. Such an agreement would probably take the form of a Development Agreement which would be recorded and would set forth, among other things, (i) the duties and obligations of the City and the Developer with respect to the establishment of the conservation easement; (ii) the terms and restrictions of the Developer's use of the habitat conservation areas, and (iii) the duties and obligations of City and Developer with respect to the long term maintenance of the conservation easement.

In regards to the establishment of native habitats, refer to Response to Comment No. 1N.

The 3.4 to 1 mitigation ratio (enhancement) for scrub communities does include consideration of the time necessary to establish scrub habitat. Refer to Response to Comment No. 1S regarding fragmentation.

The USFWS preferred form of mitigation is avoidance/preservation. This includes the avoidance/preservation of onsite resources. The USFWS does consider avoidance/preservation when determining the mitigation requirements in their approval of projects that are subject to the federal Endangered Species Act.

In regards to the 90 acres of habitat that would be removed on the Project site, impacts were found to be less than significant since the impact would not significantly reduce wildlife populations in the region.

1AA. See Response to Comment No. 1I and 1Q.

1BB. See Response to Comment No. 1I.

1CC. Consistent with CEQA Guidelines Section 15097, a Mitigation Monitoring and Reporting Program would be adopted by the City of Rancho Palos Verdes for the proposed Project. The Program would ensure that the Mitigation Measures and project revisions identified in the EIR are implemented.

1DD. The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... “the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added).”

Because the City’s NCCP is not adopted, there can not be any identified impact to the NCCP because it is not “adopted.” However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.

As discussed in the Draft EIR, the design of the City’s NCCP reserve is currently under development.<sup>6</sup> With guidance and input from the major landowner, local

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<sup>6</sup> Personal Communication: D. Snow and A. Johnston, September 2000.

government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes Peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered "equal" by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City's preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the

boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

1EE. Page 5.6-27 of the Draft EIR has been revised in the Final EIR as follows:

Schematics of the proposed treatment facilities associated with the development are illustrated in **Figure 6** ~~Exhibit 5.6-4, Discharge Pt. 1 Conceptual Drainage System Schematic, and Figure 7 Exhibit 5.6-5, Discharge Pt. 2 Conceptual Drainage System Schematic, of Appendix 15.6, Hydrology and Water Quality Report.~~

1FF. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 2**

*Donald B. Jensen, District Manager*  
California Water Service Company  
April 5, 2001

2A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 314**

*Peter Akhotnikoff, General Superintendent*  
California Water Service Company  
April 13, 2001

314A. Impacts to water services are discussed in Section 5.11 of the Draft EIR, *Public Services and Utilities*. Project implementation would increase the demand for water beyond current conditions requiring the expansion of existing facilities. Analysis has concluded that a less than significant impact would occur in this regard.

314B. As noted in Section 5.11, sufficient water supplies are available to serve the Project from existing resources. However, due to an insufficient water storage capacity which currently exists in the west portion of the peninsula, the CWSC has stated that a five million gallon tank would be required in the Project vicinity. The Applicant would be required to enter into an agreement with CWSC to determine their fair share portion of the funding associated with the water tank. Payment by the Applicant of their fair share portion of the funding associated with the tank would reduce the Project's impact to a less than significant level.

**Response to Comment No. 3**

*Allan Rigg, Director of Planning and Public Works*

City of Palos Verdes Estates

March 27, 2001

3A. Trip distribution was determined by using accepted ITE industry standards. The directional distribution of Project traffic was determined by evaluating the orientation of site access to regional facilities, given the broad geographic attractiveness of this resort hotel. In the study preparation, directional travel was estimated based on existing or predictable conditions. Alternative traffic distribution possibilities, other than the ones presented in the Draft EIR would be based on opinion only. It should also be noted that the resort hotel would provide directional assistance within promotional material that would affect patrons driving patterns for visiting the Project site. More specifically, this directional assistance would be accomplished through the following:

- hotel web site;
- hotel brochure;
- airport shuttles;
- employee manual;
- hotel telephone recordings; and
- local cable network.

The proposed Project is not expected to generate the same distribution pattern as indicated in existing intersection turning movement volumes since it is fundamentally different than the existing residential areas surrounding the site.

The traffic study follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (MTA). Based upon the County of Los Angeles traffic study guidelines, the study area should include arterial highways, freeways, and intersections generally within a one-mile radius of the Project site. The intersection of Palos Verdes Drive West/Via Corta is not listed as a CMP arterial monitoring intersection within the Los Angeles County Congestion Management Program and is located over 5 miles from the Project site.

In response to the City of Palos Verde Estates' concerns regarding the Palos Verdes Drive West/Via Corta intersection, peak period turning movement counts were conducted June 20, 2001. The existing levels of service during the morning and evening peak hours were then calculated. The traffic count data sheets, level of service worksheets for stop-controlled conditions, peak hour volume warrants, and intersection capacity utilization (ICU) worksheets are all included in Attachment 1 to Response to Comment No. 3A (following this response).

The Palos Verdes Drive West/Via Corta intersection currently operates at level of service "E" during the morning peak hour and "F" during the evening peak hour with 4-Way stop control. The intersection also currently meets the peak hour volume warrants for installation of a traffic signal. ICU calculations indicate that the intersection level of service would be acceptable with installation of a traffic signal or other improvements as deemed appropriate by the City of Palos Verdes Estates City Engineer.

- 3B. The City of Rancho Palos Verdes acknowledges and will comply with the City of Palos Verdes Estates' request that no wide and heavy load construction traffic (i.e., trucks transporting equipment and materials during construction) pass through their city limits.

**ATTACHMENT NO. 1  
TO RESPONSE TO COMMENT NO. 3A**

**PALOS VERDES DRIVE WEST/VIA CORTA  
INTERSECTION ANALYSIS CALCULATIONS**

**ATTACHMENT NO. 1**  
**CONTINUEC**

**SOUTHLAND CAR COUNTERS**  
**VEHICLE AND MANUAL COUNTS**

N-S STREET: PALOS VERDES/ DATE: 6/20/2001 CITY: PALOS  
FRONTAGE  
E-W STREET: VIA CORTA DAY: WEDNESDAY  
Intersection I.D.:  
PROJECT# 0686001A

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
RECEIVING:	X			X			X			X			
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
LANES:	0	1	0	0	1	0	0	1	0	0	1	0	

6:00 AM													
6:15 AM													
6:30 AM													
6:45 AM													
7:00 AM	2	123	1	11	59	6	12	2	3	4	0	42	265
7:15 AM	3	141	4	19	68	2	12	1	2	7	1	55	315
7:30 AM	0	158	1	26	68	11	20	2	1	8	1	60	356
7:45 AM	1	187	1	35	72	18	19	3	1	4	10	48	399
8:00 AM	0	154	8	22	76	35	27	3	1	1	11	51	389
8:15 AM	0	152	5	31	63	20	21	8	1	6	11	43	361
8:30 AM	0	169	7	34	54	17	16	3	1	4	7	39	351
8:45 AM	0	140	4	26	58	26	23	6	0	7	6	40	336
9:00 AM													
9:15 AM													
9:30 AM													
9:45 AM													
10:00 AM													
10:15 AM													
10:30 AM													
10:45 AM													
11:00 AM													
11:15 AM													
11:30 AM													
11:45 AM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
VOLUMES =	6	1224	31	204	518	135	150	28	10	41	47	378	2772

AM Peak Hr Begins at 730 AM

PEAK													
VOLUMES =	1	651	15	114	279	84	87	16	4	19	33	202	1505

ADDITIONS: 4-WAY STOP  
5-WAY STOP WITH FRONTAGE RD.



**ATTACHMENT NO. 1  
CONTINUED**

**SOUTHLAND CAR COUNTERS  
VEHICLE AND MANUAL COUNTS**

N-S STREET: PALOS VERDES/ DATE: 6/20/2001 CITY: PALOS  
FRONTAGE  
E-W STREET: VIA CORTA DAY: WEDNESDAY  
PROJECT# 0686001P

	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND			
LANES:	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
	0	1	0	0	1	0	0	1	0	0	1	0	
1:00 PM													
1:15 PM													
1:30 PM													
1:45 PM													
2:00 PM													
2:15 PM													
2:30 PM													
2:45 PM													
3:00 PM													
3:15 PM													
3:30 PM													
3:45 PM													
4:00 PM	0	102	2	46	147	26	32	1	0	21	6	38	421
4:15 PM	0	139	3	40	137	20	29	3	1	16	5	41	434
4:30 PM	0	115	2	38	175	39	26	2	2	18	3	47	467
4:45 PM	1	101	5	43	158	36	28	1	3	18	7	56	457
5:00 PM	0	138	5	45	159	31	23	6	2	28	5	56	498
5:15 PM	11	100	3	43	147	22	26	0	3	12	5	59	431
5:30 PM	1	119	1	42	142	19	45	2	0	18	5	39	433
5:45 PM	0	109	6	37	126	24	21	3	0	13	3	42	384
6:00 PM													
6:15 PM													
6:30 PM													
6:45 PM													

TOTAL	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	TOTAL
VOLUMES =	13	923	27	334	1191	217	230	18	11	144	39	378	3525

PM Peak Hr Begins at 415 PM

PEAK  
VOLUMES = 1 493 15 166 629 126 106 12 8 80 20 200 1856

ADDITIONS: 4-WAY STOP  
5-WAY STOP WITH FRONTAGE RD.

MITIG8 - Default Scenario Mon Jul 2, 2001 11:45:03

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Long Point Resort Project  
Existing  
AM Peak Hour

Level Of Service Computation Report  
1997 HCM 4-Way Stop Method (Base Volume Alternative)

\*\*\*\*\*  
Intersection #1 Palos Verdes Dr. W. (NS) / Via Corta (EW)  
\*\*\*\*\*

Cycle (sec): 0 Critical Vol./Cap. (X): 1.092  
 Loss Time (sec): 0 (Y+R = 4 sec) Average Delay (sec/veh): 46.5  
 Optimal Cycle: 0 Level Of Service: E

\*\*\*\*\*  
 Approach: North Bound South Bound East Bound West Bound  
 Movement: L - T - R L - T - R L - T - R L - T - R  
 Control: Stop Sign Stop Sign Stop Sign Stop Sign  
 Rights: Include Include Include Include  
 Min. Green: 0 0 0 0 0 0 0 0 0 0 0 0  
 Lanes: 0 0 1 0 0 1 0 1 0 0 0 0  
 \*\*\*\*\*

Volume Module:  
 Base Vol: 1 651 15 114 279 84 87 16 4 19 33 202  
 Growth Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Initial Bse: 1 651 15 114 279 84 87 16 4 19 33 202  
 User Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 PHF Volume: 1 651 15 114 279 84 87 16 4 19 33 202  
 Reduct Vol: 0 0 0 0 0 0 0 0 0 0 0 0  
 Reduced Vol: 1 651 15 114 279 84 87 16 4 19 33 202  
 PCE Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 MLF Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 Final Vol.: 1 651 15 114 279 84 87 16 4 19 33 202  
 \*\*\*\*\*

Saturation Flow Module:  
 Lanes: 0.01 0.97 0.02 1.00 1.00 1.00 0.81 0.15 0.04 0.07 0.13 0.80  
 Final Sat.: 1 596 14 499 537 599 368 68 17 41 70 431  
 \*\*\*\*\*

Capacity Analysis Module:  
 Vol/Sat: 1.09 1.09 1.09 0.23 0.52 0.14 0.24 0.24 0.24 0.47 0.47 0.47  
 Crit Moves: \*\*\*\* \*\*\*\* \*\*\*\*  
 Delay/Veh: 87.4 87.4 87.4 11.8 16.0 9.5 12.6 12.6 12.6 14.7 14.7 14.7  
 Delay Adj: 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00  
 AdjDel/Veh: 87.4 87.4 87.4 11.8 16.0 9.5 12.6 12.6 12.6 14.7 14.7 14.7  
 LOS by Move: F F F B C A B B B B B B  
 ApproachDel: 87.4 13.8 12.6 14.7  
 Delay Adj: 1.00 1.00 1.00  
 ApprAdjDel: 87.4 13.8 12.6 14.7  
 LOS by Appr: F B B B  
 \*\*\*\*\*

MITIG8 - Default Scenario Mon Jul 2, 2001 11:45:14

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Long Point Resort Project  
Existing  
PM Peak Hour

Level Of Service Computation Report

1997 HCM 4-Way Stop Method (Base Volume Alternative)

\*\*\*\*\*  
Intersection #1 Palos Verdes Dr. W. (NS) / Via Corta (EW)  
\*\*\*\*\*

Cycle (sec): 0 Critical Vol./Cap. (X): 1.219  
Loss Time (sec): 0 (Y+R = 4 sec) Average Delay (sec/veh): 67.3  
Optimal Cycle: 0 Level Of Service: F  
\*\*\*\*\*

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Stop Sign			Stop Sign			Stop Sign			Stop Sign		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0	0	1	0	0	1	0	0	1	0	0	1

Volume Module:	North Bound			South Bound			East Bound			West Bound		
Base Vol:	1	493	15	166	629	126	106	12	8	80	20	200
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	1	493	15	166	629	126	106	12	8	80	20	200
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	1	493	15	166	629	126	106	12	8	80	20	200
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	1	493	15	166	629	126	106	12	8	80	20	200
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	1	493	15	166	629	126	106	12	8	80	20	200

Saturation Flow Module:	North Bound			South Bound			East Bound			West Bound		
Lanes:	0.01	0.96	0.03	1.00	1.00	1.00	0.84	0.10	0.06	0.26	0.07	0.67
Final Sat.:	1	520	16	481	516	573	350	40	26	133	33	331

Capacity Analysis Module:	North Bound			South Bound			East Bound			West Bound		
Vol/Sat:	0.95	0.95	0.95	0.34	1.22	0.22	0.30	0.30	0.30	0.60	0.60	0.60
Crit Moves:	****			****			****			****		
Delay/Veh:	52.1	52.1	52.1	14.1	138	10.7	14.5	14.5	14.5	19.7	19.7	19.7
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	52.1	52.1	52.1	14.1	138	10.7	14.5	14.5	14.5	19.7	19.7	19.7
LOS by Move:	F	F	F	B	F	B	B	B	B	C	C	C
ApproachDel:	52.1			98.4			14.5			19.7		
Delay Adj:	1.00			1.00			1.00			1.00		
ApprAdjDel:	52.1			98.4			14.5			19.7		
LOS by Appr:	F			F			B			C		

# PEAK HOUR VOLUME WARRANT (Urban Area)

Existing

Major Street Name = **Palos Verdes Dr. W.**

Total of Both Approaches (VPH) = **1430**

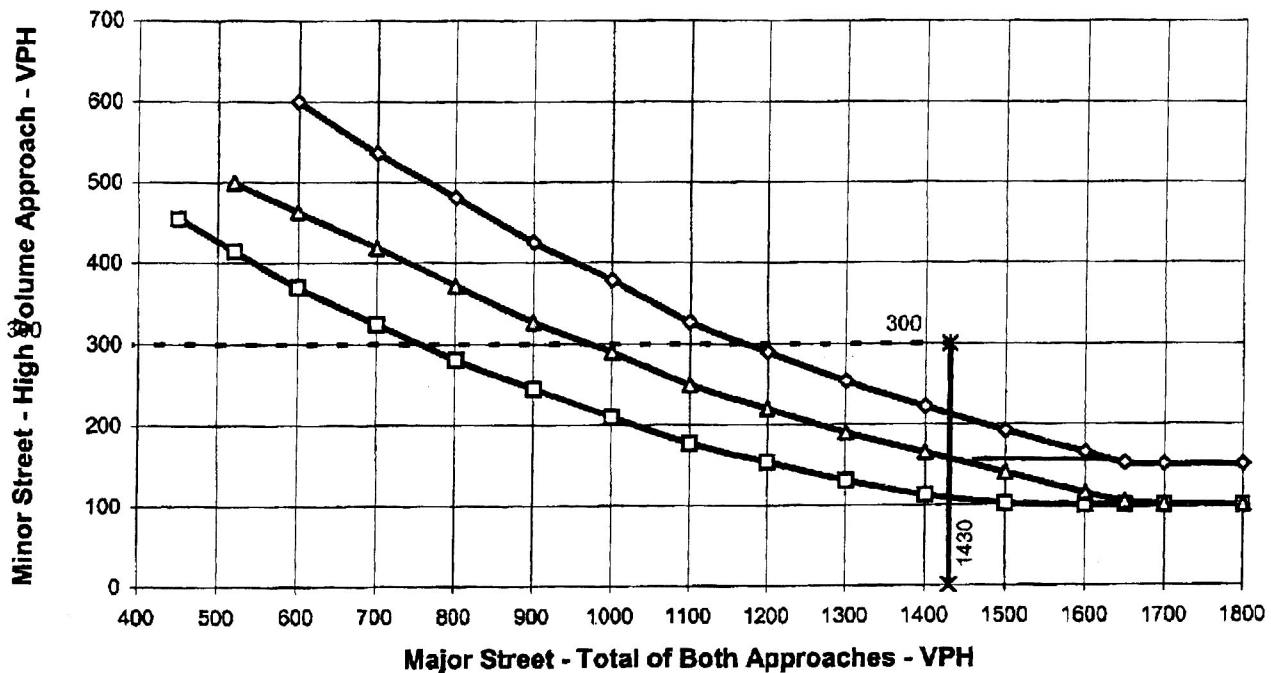
Number of Approach Lanes on Major Street = **1**

Minor Street Name = **Via Corta**

High Volume Approach (VPH) = **300**

Number of Approach Lanes On Minor Street = **1**

**WARRANTED FOR A SIGNAL**



- 1 Lane (Major) & 1 Lane (Minor)
- △— 2+ Lanes (Major) & 1 Lane (Minor) OR 1 Lane (Major) & 2+ Lanes (Minor)
- ◇— 2+ Lanes (Major) & 2+ Lanes (Minor)
- ×— Major Street Approaches
- \* - Minor Street Approaches

\* NOTE:

150 VPH APPLIES AS THE LOWER THRESHOLD VOLUME FOR A MINOR STREET APPROACH WITH TWO OR MORE LANES AND 100 VPH APPLIES AS THE LOWER THRESHOLD VOLUME FOR A MINOR STREET APPROACHING WITH ONE LANE.

Intersection: Palos Verdes Dr. West (NS) / Via Corta (EW)

Project: Long Point Specific Plan

Traffic Condition: Existing

Lane Configuration: Initial

AM Intersection Capacity Analysis

Move	Lanes	Capacity	Volume	V/C Ratio
NL	0.0	1600	1	0.01
NT	1.0	1600	651	0.42*
NR	0.0	1600	15	0.01
SL	1.0	1600	114	0.07*
ST	1.0	1600	279	0.17
SR	1.0	1600	84	0.05
EL	0.0	1600	87	0.05*
ET	1.0	1600	16	0.07
ER	0.0	1600	4	0.01
WL	0.0	1600	19	0.01
WT	1.0	1600	33	0.16*
WR	0.0	1600	202	0.13
Clearance Interval Percentage =				0.10
Sum of Critical Movements =				0.80 C

PM Intersection Capacity Analysis

Move	Lanes	Capacity	Volume	V/C Ratio
NL	0.0	1600	1	0.01
NT	1.0	1600	493	0.32*
NR	0.0	1600	15	0.01
SL	1.0	1600	166	0.10*
ST	1.0	1600	629	0.39
SR	1.0	1600	126	0.08
EL	0.0	1600	106	0.07*
ET	1.0	1600	12	0.08
ER	0.0	1600	8	0.01
WL	0.0	1600	80	0.05
WT	1.0	1600	20	0.19*
WR	0.0	1600	200	0.13
Clearance Interval Percentage =				0.10
Sum of Critical Movements =				0.78 C

\* denotes critical movement

**Response to Comment No. 4**

Allan Rigg, Director of Planning and Public Works

City of Palos Verdes Estates

March 21, 2001

- 4A. Concern has been expressed with respect to the conversion of the Palos Verdes Intermediate School into a high school and reopening of the Margate School as an intermediate school, and whether these events have been accounted for in the traffic study. The attached Table 4A-1 summarizes the facility changes proposed by the Palos Verdes Unified School District within the study area. It is important to note that all of the sites are currently occupied by various uses which generate traffic that has been accounted for in the assessment of existing conditions contained in the Long Point Resort Project Traffic Impact Analysis and Section 5.12 of the Draft EIR, *Traffic and Circulation*.

Trip generation rates and resulting trip generation estimates for existing uses are provided on Table 4A-2. Table 4A-3 shows the vehicle trip rates and resulting trip generation estimates for future uses at each of the affected sites. A comparison of existing and future trip generation levels at each site is presented in Table 4A-4.

The Margate School is currently occupied by an assortment of community-based services, including counseling, therapy, clinics, preschool, and a special education program. The existing uses will be replaced by an intermediate school which will accommodate a maximum of 990 students. The net increase in traffic generation will be approximately 129 vehicle trip ends per day, with an additional 379 vehicle trip ends occurring during the morning peak hour and 58 additional trip ends during the evening peak hour.

The Palos Verdes Intermediate School (Palos Verdes High School) site currently contains 1140 students in intermediate grades. These students will be transferred to Margate School, with a balance of 150 students having to transfer to another intermediate school within the District. When this school opens as the new high school, it will accommodate a maximum of 2,200 students. At that time, the net increase in traffic generation will amount to 2,285 daily vehicle trip ends, with an additional 488 vehicle trip ends occurring during the morning peak hour and 148 additional vehicle trip ends occurring during the evening peak hour.

At the Peninsula High School site, 3,171 students are currently accommodated on a campus originally designed for 2,200 students. After the Palos Verdes High School reaches its full student load, the Peninsula High School will serve a maximum of 2,200 students. This represents a reduction of approximately 1,738 daily vehicle trip ends, with a reduction of 447 vehicle trip ends during the morning peak hour and 145 vehicle trip ends during the evening peak hour.

As a result of the Palos Verdes Unified School District facility changes described above, the high school student capacity will be increased in the study area by approximately 1200 students. Because high school traffic will now be distributed between two different sites, some variation in traffic will occur. The traffic changes may be noticeable during the morning peak hour when peak school traffic occurs simultaneously with peak commuter traffic. The intersection of Palos Verde Drive West and Hawthorne Boulevard will be impacted by the combination of both increased traffic to the Palos Verdes High School with increased project traffic. The attached Table 4A-5 summarizes the intersection capacity utilization values at this intersection with an additional increase of traffic oriented to the Palos Verdes High School site. The potential volume increases do not change the traffic study findings regarding acceptable service levels, Project impacts or specified mitigation measures.

TABLE 4A-1

## PALOS VERDES UNIFIED SCHOOL DISTRICT FACILITY CHANGES

SITE	EXISTING LAND USE	FUTURE LAND USE
Margate School	57,140 square feet of community based services (counseling, therapy, clinics, preschools, and special education program)	Intermediate school, 990 students
Palos Verdes High School	Intermediate school, 1,140 students	High school, 2,200 students

**TABLE 4A-2**

**EXISTING LAND USE TRIP GENERATION AT PALOS VERDES SCHOOL DISTRICT FACILITIES**

LAND USE	QUANTITY	UNITS <sup>2</sup>	RATES <sup>1</sup>					TRIP GENERATION				
			PEAK HOUR				DAILY	PEAK HOUR				DAILY
			AM		PM			AM		PM		
			IN	OUT	IN	OUT		IN	OUT	IN	OUT	
Community Center	57.14	TSF	0.87	0.45	0.60	1.15	22.88	50	26	34	66	1,307
Intermediate School	1,140	ST	0.26	0.20	0.08	0.08	1.45	296	228	91	91	1,653
High School	3,171	ST	0.32	0.14	0.06	0.09	1.79	1,015	444	190	285	5,676

**TABLE 4A-3**

**TRIP GENERATION WITH FUTURE PALOS VERDES SCHOOL DISTRICT CHANGES**

LAND USE	QUANTITY	UNITS <sup>2</sup>	RATES <sup>1</sup>					TRIP GENERATION				
			PEAK HOUR				DAILY	PEAK HOUR				DAILY
			AM		PM			AM		PM		
			IN	OUT	IN	OUT		IN	OUT	IN	OUT	
Intermediate School	990	ST	0.26	0.20	0.08	0.08	1.45	257	198	79	79	1,436
High School	2,200	ST	0.32	0.14	0.06	0.09	1.79	704	308	132	198	3,938
High School	2,200	ST	0.32	0.14	0.06	0.09	1.79	704	308	132	198	3,938
TOTAL								1,665	814	343	475	9,312



**TABLE 4A-4**

**TRIP GENERATION COMPARISON WITH CHANGES TO PALOS VERDES SCHOOL DISTRICT FACILITIES**

LAND USE	SITE	LAND USE	QUANTITY	UNITS <sup>1</sup>	PEAK HOUR				DAILY
					AM		PM		
					IN	OUT	IN	OUT	
Existing	Margate School	Community Center	57.14	TSF	50	26	34	66	1,307
Future	Margate School	Intermediate School	990	ST	257	198	79	79	1,436
DIFFERENCE					+207	+172	+45	+13	+129
Existing	Palos Verdes High School	Intermediate School	1,140	ST	296	228	91	91	1,653
Future	Palos Verdes High School	High School	2,200	ST	704	308	132	198	3,938
DIFFERENCE					+408	+80	+41	+107	+2,285
Existing	Peninsula High School	High School	3,171	ST	1,015	444	190	285	5,676
Future	Peninsula High School	High School	2,200	ST	704	308	132	198	3,938
DIFFERENCE					-311	-136	-58	-87	-1,738

**TABLE 4A-5**

**INTERSECTION ANALYSIS FOR EXISTING PLUS AMBIENT GROWTH  
PLUS PROPOSED PROJECT PLUS OTHER DEVELOPMENT CONDITIONS**

INTERSECTION	INTERSECTION APPROACH LANES <sup>1</sup>												ICU <sup>2</sup>		LOS <sup>3</sup>	
	NORTHBOUND			SOUTHBOUND			EASTBOUND			WESTBOUND						
	L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
Palos Verdes Dr. West (NS) at: Hawthorne Blvd. (EW)																
- W/O additional high school traffic	1	2	1	1	2	0	1	1	0	1	1	0	0.56	0.60	A	A
- W/additional high school traffic	1	2	1	1	2	0	1	1	0	1	1	0	0.68	0.63	B	B

# ATTACHMENT NO. 1 TO RESPONSE TO COMMENT NO. 4A

Intersection: Palos Verdes Dr. West (NS) / Hawthorne Blvd. (EW)

Project: Long Point Specific Plan

Traffic Condition: Existing + Ambient Growth + Project + Other  
Lane Configuration: Initial

## AM Intersection Capacity Analysis

Move	Lanes	Capacity	Volume	V/C Ratio
NL	1.0	1600	9	0.01
NT	2.0	3200	327	0.10*
NR	1.0	1600	385	0.24
SL	1.0	1600	233	0.15*
ST	2.0	3200	252	0.08
SR	0.0	1600	1	0.01
EL	1.0	1600	4	0.01*
ET	1.0	1600	15	0.02
ER	0.0	1600	24	0.02
WL	1.0	1600	249	0.16
WT	1.0	1600	5	0.20*
WR	0.0	1600	310	0.19
				=====
Clearance Interval Percentage =				0.10
Sum of Critical Movements =				0.56    A

## PM Intersection Capacity Analysis

Move	Lanes	Capacity	Volume	V/C Ratio
NL	1.0	1600	29	0.02
NT	2.0	3200	295	0.09*
NR	1.0	1600	403	0.25
SL	1.0	1600	191	0.12*
ST	2.0	3200	279	0.09
SR	0.0	1600	5	0.01
EL	1.0	1600	3	0.01
ET	1.0	1600	9	0.02*
ER	0.0	1600	15	0.01
WL	1.0	1600	428	0.27*
WT	1.0	1600	19	0.11
WR	0.0	1600	153	0.10
				=====
Clearance Interval Percentage =				0.10
Sum of Critical Movements =				0.60    A

\* denotes critical movement

**ATTACHMENT NO. 1**  
**CONTINUED**

Intersection: Palos Verdes Dr. West (NS) / Hawthorne Blvd. (EW)

Project: Long Point Specific Plan

Traffic Condition: Existing + Ambient Growth + Project + Other

Lane Configuration: Initial

AM Intersection Capacity Analysis

Move	Lanes	Capacity	Volume	V/C Ratio
NL	1.0	1600	9	0.01
NT	2.0	3200	449	0.14*
NR	1.0	1600	385	0.24
SL	1.0	1600	257	0.16*
ST	2.0	3200	276	0.09
SR	0.0	1600	1	0.01
EL	1.0	1600	4	0.01*
ET	1.0	1600	15	0.02
ER	0.0	1600	24	0.02
WL	1.0	1600	249	0.16
WT	1.0	1600	5	0.27*
WR	0.0	1600	432	0.27
				=====
Clearance Interval Percentage =				0.10
Sum of Critical Movements =				0.68    B

PM Intersection Capacity Analysis

Move	Lanes	Capacity	Volume	V/C Ratio
NL	1.0	1600	29	0.02
NT	2.0	3200	307	0.10*
NR	1.0	1600	403	0.25
SL	1.0	1600	223	0.14*
ST	2.0	3200	311	0.10
SR	0.0	1600	5	0.01
EL	1.0	1600	3	0.01
ET	1.0	1600	9	0.02*
ER	0.0	1600	15	0.01
WL	1.0	1600	428	0.27*
WT	1.0	1600	19	0.12
WR	0.0	1600	165	0.10
				=====
Clearance Interval Percentage =				0.10
Sum of Critical Movements =				0.63    B

\* denotes critical movement

**Response to Comment No. 5***Kay Bara*

Coastal Conservation Coalition

April 6, 2001

- 5A. The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... "the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added)."

Because the City's NCCP is not adopted, there can not be any identified impact to the NCCP because it is not "adopted." However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.

As discussed in the Draft EIR, the design of the City's NCCP reserve is currently under development.<sup>7</sup> With guidance and input from the major landowner, local government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered "equal" by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City's preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.

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<sup>7</sup> Personal Communication: D. Snow and A. Johnston, September 2000.

- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

- 5B. Pursuant to CEQA Guidelines Section 15126.6, Section 7.0, *Alternatives to The Proposed Project*, evaluates the comparative merits of the Alternatives and the proposed Project as identified in Section 3.0, *Project Description*. Therefore, a comparative analysis of Alternative 7.2 and Alternative 7.5 is not required under CEQA Guidelines.
- 5C. As noted in Section 10.9, *Population And Housing*, the number of Project employees who may choose to relocate to the City is not anticipated to be substantial. Nonetheless, in order to minimize the impact of the Project's employment generation on the local housing market, the Project applicant would be subject to compliance with Municipal Code Chapter 17.11, *Affordable Housing*. According to Section 17.11.140.C., *Fee Required*, prior to issuance of a Certificate of Occupancy, developers of commercial development shall pay a residential impact

fee to be set by resolution of the City Council according to the number of employees generated. Project compliance with Municipal Code Chapter 17.11, *Affordable Housing*, would reduce impacts with regard to affordable housing to a less than significant level.

- 5D. Regarding the “sound evidence” of the proposed mitigation, the proposed mitigation approach for the UPVA and RHA is based on two main concepts of open space planning regarding natural resources : (1) preserve high value areas to the greatest extent possible and (2) enhance those areas with native habitat that currently do not support high biological value. These general concepts have been applied to both the LPHCP and the mitigation program for the Draft EIR.

As a point of clarification, the discussion of the 4(d) special rule process of the NCCP program in this section of the document does not state that the proposed Project would use the 4(d) process, but rather the discussion on Page 5.3-63 states that the previously approved mitigation plans that are part of the City’s NCCP 4(d) process contribute commutatively to the preservation and enhancement of coastal sage scrub within the subregion.

Refer also to Response to Comment No. 5A.

- 5E. The discussion on the El Segundo blue butterfly on Pages 5.3-2 and 5.3-48 of the Draft EIR have been revised in Volume IV, *Revised Biological Resources Section*.

Page 5.3-26 of the Draft EIR has been revised to reflect the correct plant which is associated with the El Segundo blue butterfly (*Euphilotes battoides allyni*): coast buckwheat (*Eriogonum parvifolium*) (refer to Volume IV, *Revised Biological Resources Section*). Additionally, the discussion regarding this issue has been revised.

Page 5.3-65 of the Draft EIR, Mitigation Measure 5.3-1c, has been revised to reflect the El Segundo blue butterfly (refer to Volume IV, *Revised Biological Resources Section*).

- 5F. Contrary to the comments made in this comment, the Project site contains a high number of non-native plant species and is disturbed by numerous trails. In addition, a high number feral animals are known to occur in the area. Field observations of the adjacent Subregion 1 (Oceanfront) site prior to grading, included over eight house cats in one field visit.

It has been documented<sup>8</sup> that restored sage scrub and other habitat types, when done in a biologically sound manner and under supervision of a qualified biologist with experience in native plant restoration, can and will support a wide variety of native plant and animal species including those listed as threatened or endangered by the state and federal regulatory agencies. The creation of habitat is an approved form of mitigation by the regulatory agencies and is often a component of compensation/mitigation plans that are processed with these agencies.

Because of the mitigation of the proposed plan, including preservation, restoration, and protection of retained native habitats, it is expected that the proposed Project site would continue to support the gnatcatcher both for breeding and dispersal activity.

- 5G. As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant pallet would only include locally appropriate native species. In regards to wildlife movement, the steep cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted. The project design of the UPVA area has maintained a connection to the open space areas off-site. In addition, the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation as discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

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<sup>8</sup> November 21, 2001. Year-end Report for the Ocean Trails HCP Area California Gnatcatcher Study, City of Rancho Palos Verdes, Los Angeles County, California - Permit # PRT-800922.

The proposed habitat preservation and restoration outlined above and illustrated on 5.3-4 increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

In regards to significant impacts on “important corridors”, Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites.* Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

Refer to Response to Comment No. 5A.

- 5H. Impacts to coastal sage scrub habitat within the City are required by the federal Endangered Species Act (ESA) to be mitigated on a project-by-project basis according to regulation requirements of Section 4, 7, or 10 of the ESA. The resource agencies, both the U.S. Fish and Wildlife Service and the California Department of Fish and Game, would not allow the removal of coastal sage scrub without a program that provides for the long-term preservation and/or restoration of coastal sage scrub. In many, if not all instances, the amount of habitat preserved and/or restored is over two times as great as the area impacted.

Refer to Response to Comment No. 5A for additional comments on the NCCP.



- 5I. Exhibit 5.13-1 of the Draft EIR, *Proposed Recreational Facilities*, illustrates the locations of the proposed pedestrian trails, resort walkways, golf cart paths, joint-use trails, multi-use trails, public parking areas, stairways, scenic view points, and shore access. The following table details the recreational facilities proposed by the current Long Point Resort Project:

Recreational Facility	Long Point Resort Project		
	RHA	UPVA	Total
Pedestrian Trails (Miles)	2.1	0.9	3.0
Resort Walkways (Miles)	1.3	0.0	1.3
Golf Cart Paths (Miles)	1.6	1.6	3.2
Joint-use Trails (Miles)	0.9	0.0	0.9
Multi-use Trails (Miles)	1.8	0.0	0.8
Off-Site Regional Trails (Miles) <sup>1</sup>	n/a	n/a	1.9
<b>TOTAL TRAILS</b>	6.7	2.5	11.1
General Public Parking (Spaces)	100	40 <sup>2</sup>	140
Stairways	1	1	2
Scenic View Points	3	5	8
Shore Access	2	n/a	2
Golf Course/Practice Area (Acres)	33.9	37.1 <sup>3</sup>	71.0
General Public Park (Acres)	2.0	2.8	4.8
General Public Park Improvements (Acres)	5.0	0.0	5.0
Habitat Conservation Area (Acres)	6.7	24.9	31.6

1. Off-site trail improvements include the Vanderlip Trail Connection, Point Vicente Trail, Salvation Army Trail, and the City Hall Segment/Hawthorne Trail.
2. These 40 public parking spaces serve both the Public Golf Practice Facility and the Point Vicente Overlook Park on the Upper Point Vicente Area.
3. This acreage includes native habitat areas within the golf course, but does not include the 2.8 acres of general-use public parks or the 24.9 acres of Native Habitat Conservation that are out of bounds to golf.

On the Resort Hotel Area, the existing entitlement plan called out the on-site portions of the Marineland Segment Trail "C-5", Flower Field Trail "E-2", and Long Point Trails "D". The Draft EIR prepared for the previously proposed Project did not quantify the length of these trails. However, the Project was conditioned by the City of Rancho Palos Verdes (Condition C-5) as follows:

*Prior to the approval of the conceptual site plan by the Planning Commission (i.e., a future plan revised to reflect the City's conditional approval), the developer shall submit and receive approval of a public amenities plan,*

*including specific design standards and placement of all trails, vista points, parking facilities, subject to the review (of) the Trails Committee, the Director of Environmental Services, and the Director of Parks and Recreation, and approval by the City Council (Resolution No. 91-43, Exhibit "A", p. 6).*

When compared to the proposed Project, the No Development Alternative would provide none of the recreational facilities proposed on the UPVA. More specifically, this Alternative would not provide 2.5 miles of trails, one stairway, 5 scenic view points, 2.8 acres of general public parks and a golf practice facility. Additionally, the 1.9 miles of off-site regional trails would not be provided. Further, as previously noted, the quantity of recreational facilities proposed on the RHA is uncertain since the Draft EIR prepared for the previously proposed Project did not quantify the length of these trails, nor did it provide a Proposed Recreational Facilities Map illustrating the proposed facilities. As noted in Section 5.13, *Recreation*, analysis has concluded that the trails (and their alignment) proposed as part of the Long Point Resort Project would be consistent with the policies and recommendations identified in the General Plan, Coastal Specific Plan, Conceptual Trails Plan, and Conceptual Bikeways Plan. However, based on the available data, it is concluded that of the five trails provided by the proposed Project, the Coastal Access Trail and the Resort Entry Trail would not be developed with this Alternative.

It is acknowledged that both the proposed Project and this Alternative would provide a golf course. However, based on the available data, this Alternative would provide less recreational opportunities than the proposed Project, therefore, only partially fulfilling the Project's objectives to provide open space and trails.

Page 7.15 of the Draft EIR has been revised in the Final EIR to reflect the data discussed above regarding trails proposed under the existing entitlement.

- 5J. Alternative 7.9, *Point Vicente Park Enhancement Alternative*, does not involve the development of a resort hotel on the RHA therefore, would not fulfill the objectives noted in this comment of establishing a destination coastal resort or improving water quality through construction and implementation of a Runoff Management/Water Quality Management Plan. This would be consistent with CEQA Guidelines Section 15126.6(c) which state the following:

*"Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts. [Emphasis added.]"*

Additionally, Section 7.0, *Alternatives to The Proposed Project*, has been expanded to include Alternative 7.10, *Point Vicente Park Enhancement and Existing Entitlement Alternative*.

**Response to Comment No. 6**

*Richard Wagner, Chief*

County of Los Angeles, Department of Health Services, Environmental Health  
February 12, 2001

- 6A. This comment letter notes that the Department is satisfied with the environmental document with respect to water supply and wastewater treatment. The Department has no further comments.

**Response to Comment No. 7**

*Author Unknown*

County of Los Angeles Fire Department  
February 6, 2001

- 7A. This letter is a request for two additional copies of the Draft EIR. Two additional copies were submitted to the County of Los Angeles Fire Department on February 21, 2001, by the City of Rancho Palos Verdes.

**Response to Comment No. 8**

*David R. Leininger, Acting Chief*

County of Los Angeles Fire Department  
March 15, 2001

- 8A. Page 5.11-11 of the Draft EIR has been revised in the Final EIR as follows:

Consequently, it is anticipated that Project implementation would have an impact on the adequacy of the Fire Department's level of service since the proposed resort development would increase the potential for urban-related fire and life safety occurrences on the site. ~~Since the Project is situated within the Consolidated Fire Protection District, the District would receive property tax revenues from the property. This funding is to be used for staffing and equipment and would result in less than significant impacts.~~

Further, it should be noted that the Fire Department's current Five-Year Fire Station Plan includes a new station to be built near the Palos Verdes Peninsula coast between existing Fire Stations No. 53 and No. 2. The new station is rated Priority 5 which is the lowest priority level. As such, it does

not have a firm time frame, location, or budget allocation.<sup>9, 10</sup> However, according to the Fire Department, the tentative date for the new station project initiation is 2004 to 2005, and the target occupancy date is 2007 to 2008.<sup>11</sup> As the Project proposes approximately 600,000 square feet of new development, featuring a high-occupancy destination resort complex, Project implementation would contribute significantly toward the need for this new fire facility.<sup>12</sup>

Project implementation would potentially impact the Fire Department's level of service, however, it would not warrant the construction of new fire protection related facilities, nor would it result in the need for alteration of existing facilities. and would contribute to the need for construction of a new fire station. Since the Project is situated within the Consolidated Fire Protection District, the District would receive property tax revenues from the property. According to the LACFD, this funding, which would be used for staffing and equipment, would offset the costs associated with the increased demand for fire protection services and new fire facilities associated with the proposed Project.<sup>13</sup> Therefore, a less than significant impact would occur in this regard.

8B. Page 5.11-12 of the Draft EIR has been revised in the Final EIR as follows:

As previously stated, the proposed development would be required to comply with all applicable City and County code and ordinance requirements for with respect to the following:

- construction;
- access roadways;
- water mains;
- fire flows and hydrants fire hydrant spacing;
- brush clearance; and
- fuel modification plans;
- maximum allowable grade;

<sup>9</sup> Correspondence: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 16, 2001.

<sup>10</sup> As the timing and location of the new fire station is unknown at this time, it's development would be subject to the CEQA review process independent of the proposed Project.

<sup>11</sup> Telecon: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 18, 2001.

<sup>12</sup> Correspondence: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 16, 2001.

<sup>13</sup> Telecon: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 18, 2001.

- turning radii;
- limited access devices (gates, etc.); and
- traffic calming measures.

The proposed Project would be subject to the applicable codes which include fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five hour duration; and minimum driveway widths. Additionally, it should be noted that the proposed Project would be required to obtain approval from the Fire Department as a Standard Condition of Approval from the City of Rancho Palos Verdes.

It should be noted that the comment with respect to High-Density Residential is not applicable to the proposed Project.

### **Response to Comment No. 316**

*Danny Kolker, Planning Analyst*  
County of Los Angeles Fire Department  
May 10, 2001

316A. Page 5.11-11 of the Draft EIR has been revised in the Final EIR as follows:

Consequently, it is anticipated that Project implementation would have an impact on the adequacy of the Fire Department's level of service since the proposed resort development would increase the potential for urban-related fire and life safety occurrences on the site. ~~Since the Project is situated within the Consolidated Fire Protection District, the District would receive property tax revenues from the property. This funding is to be used for staffing and equipment and would result in less than significant impacts.~~

Further, it should be noted that the Fire Department's current Five-Year Fire Station Plan includes a new station to be built near the Palos Verdes Peninsula coast between existing Fire Stations No. 53 and No. 2. The new station is rated Priority 5 which is the lowest priority level. As such, it does not have a firm time frame, location, or budget allocation.<sup>14, 15</sup> However, according to the Fire Department, the tentative date for the new station project initiation is 2004 to 2005, and the target occupancy date is 2007 to 2008.<sup>16</sup> As the Project proposes approximately 600,000 square feet of new

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<sup>14</sup> Correspondence: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 16, 2001.

<sup>15</sup> As the timing and location of the new fire station is unknown at this time, it's development would be subject to the CEQA review process independent of the proposed Project.

<sup>16</sup> Telecon: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 18, 2001.

development, featuring a high-occupancy destination resort complex, Project implementation would contribute significantly toward the need for this new fire facility.<sup>17</sup>

Project implementation would potentially impact the Fire Department's level of service, however, it would not warrant the construction of new fire protection related facilities, nor would it result in the need for alteration of existing facilities. and would contribute to the need for construction of a new fire station. Since the Project is situated within the Consolidated Fire Protection District, the District would receive property tax revenues from the property. According to the LACFD, this funding, which would be used for staffing and equipment, would offset the costs associated with the increased demand for fire protection services and new fire facilities associated with the proposed Project.<sup>18</sup> Therefore, a less than significant impact would occur in this regard.

#### **Response to Comment No. 9**

*Felicia Ursitti, Project Engineer*

County Sanitation Districts of L.A. County

February 7, 2001

9A. Page 5.11-8 of the Draft EIR has been revised in the Final EIR as follows:

Puente Hills Landfill is permitted to receive 72,000 tons of non-hazardous solid and inert waste per week. According to the District, this landfill is expected to reach capacity between the year 2003 and the year 2006. The landfill's existing local land use permit is valid through November 1, 2003, at which time it would need to be renewed to continue operations. The proposed permit renewal would extend the expected capacity of the landfill to the year 2013.

9B. Page 5.11-9 of the Draft EIR has been revised in the Final EIR as follows:

The South Gate Transfer Station, under it's Solid Waste Facility permit, is permitted to accept up to 1,000 tons/day, and currently receives an average of approximately 545 tons of non-hazardous solid and inert waste per day.

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<sup>17</sup> Correspondence: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 16, 2001.

<sup>18</sup> Telecon: Danny Kolker, Planning Analyst, County of Los Angeles Fire Department, May 18, 2001.

**Response to Comment No. 10**

*Ruth I. Frazen, Engineering Technician*

County Sanitation Districts of L.A. County

March 9, 2001

10A. Page 5.11-5 of the Draft EIR has been revised in the Final EIR as follows:

The wastewater generated by the Project site is treated at the Joint Water Pollution Control Plant (JWPCP), located at 24501 South Figueroa in Carson. The JWPCP has a design capacity of 385.0 mgd and currently processes an average flow of 332.4 **334.1** mgd.

10B. Page 5.11-16 of the Draft EIR has been revised in the Final EIR as follows:

Project implementation would not result in a significant impact with respect to wastewater services, **although the Districts' facilities may be affected by the proposed Project.** It should be noted that the construction of improvements within a Districts' sewer easement and/or over a Districts' trunk sewer would require approval from the Districts before the commencement of construction. Additionally, the Districts require a **Trunk Sewer Connection Permit and** charges a fee for the privilege of connecting (directly or indirectly) to their sewerage system or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. **As indicated in Exhibit 5.11-2, Upper Point Vicente Area Infrastructure Plan, the Project proposes direct connections to a District's trunk sewer and, therefore, would be required to obtain a permit and pay a fee.** With **a permit and** payment of this connection fees to offset the costs to construct an incremental expansion of the existing sewerage system, the Project's impact would be considered as less than significant.

10C. Refer to Response to Comment No. 10B.

**Response to Comment No. 11**

*Michael Mohler, Vice President*

Destination Development Corporation

April 5, 2001

- 11D. Chenopod scrub (also referred to as saltbush scrub) is a recognized "scrub type" similar to southern cactus scrub, southern coastal bluff scrub, and coastal sage scrub. It is acknowledged in the Draft EIR that this area is heavily disturbed; however, this area contains the plant species type and density that warrant the designation of chenopod scrub. This designation is also consistent with the definition of "saltbush scrub" in the Palos Verdes Peninsula Subarea NCCP program Phase I Summary Report (December 1998). Although saltbush scrub is not identified on the Project site by the NCCP report, the mapping done for the regional plan is at a much more "macro" scale and may not have had the level of field investigation that would have identified the relatively small patch of disturbed chenopod scrub within the surrounding annual grassland (also containing ruderal species) on the Project site.

Regarding mitigation, Dr. Pat Mock, the biological consultant preparing the NCCP documents, has stated that in the NCCP documents, the "scrub types" were all given the same level of biological importance when considered for inclusion of the reserve design. Please note that the mitigation for the project was not increased as a result of the identification of the chenopod scrub onsite. The Long Point Habitat and Conservation Plan contained enough onsite preservation and enhancement to mitigate all scrub impacts.

The chenopod scrub onsite would require mitigation based on precedent set by the USFWS in the concurrence of the Interim Habitat Loss Permit for the Subregion 1 (Oceanfront) project site (see attached). The Subregion 1 project was required to mitigate for both chenopod (quail bush) scrub and coastal sage scrub/grassland ecotone. The required restoration ratio was 4.2 acre of restored habitat for 1 acre impacted.

The attached underlined text from Page II-16 of the County of Orange Central and Coastal Subregion Natural Community Conservation Plan/Habitat Conservation Plan provides further confirmation for the current identification of chenopod scrub which would be applicable to the onsite conditions.

- 11E. The discussion of the regulatory options to obtain authorization from the USFWS regarding impacts on gnatcatchers and coastal sage scrub would remain as stated in the Draft EIR.
- 11F. Pages 5.3-2, 5.3-25, 5.3-26, and 5.3-48 of the Draft EIR have been revised to reflect the focused surveys for the Palos Verdes blue butterfly conducted between March 17 and April 22, 2001 (refer to Volume IV, *Revised Biological Resources Section*). Additionally the discussion on the El Segundo blue butterfly has been



revised on Pages 5.3-2 and 5.3-48 (refer to Volume IV, *Revised Biological Resources Section*).

Page 5.3-65, Mitigation Measure 5.3-1c, of the Draft EIR has been revised to reflect the El Segundo blue butterfly (refer to Volume IV, *Revised Biological Resources Section*).

11G. Refer to Response to Comment No. 11F.

11H. Refer to Response to Comment No. 11D.

11I. The Draft EIR states that 16.8 acres of sage scrub habitat would be restored/created on the UPVA, not 15.7 acres.

Refer to Volume IV, *Revised Biological Resources Section*, for a discussion of the phasing plan proposed as a part of the LPHCP.

Please note that the Draft EIR identified 4.91 acres of scrub communities impacted by the proposed Project, not 2.21 acres as noted in this comment. Also, refer to Response to Comment No. 11D.

11J. Refer to Response to Comment No. 11D.

11K. The Pages 5.3-2, 5.3-36, and 5.3-52 of the Draft EIR have been revised to incorporate new information regarding the Pacific pocket mouse (refer to Volume IV, *Revised Biological Resources Section*).

Page 5.3-18 of the Draft EIR, Table 5.3-3, *Special Status Wildlife Species Potentially Occurring Within the Project Region*, has been revised with respect to the "Likelihood of Occurrence" for the Pacific pocket mouse (refer to Volume IV, *Revised Biological Resources Section*).

Page 5.3-66, Mitigation Measure 5.3-1f, of the Draft EIR has been revised (omitted) (refer to Volume IV, *Revised Biological Resources Section*).

11L. The impact area for the RHA has been determined by BonTerra Consulting based on the Grading Plan (October 2, 2000). The impact area was determined to include a small portion of coastal bluff scrub when the impact area was integrated into the GIS program and compared with the vegetation maps of the site. However, the Project Applicant has noted that they would avoid any impact to coastal bluff scrub, regardless of what may be indicated on the map. Because the mapping exercise indicated that a small area would be impacted, mitigation to avoid these areas was specified.

11M. Refer to Response to Comment No. 11L.

- 11N. The Jurisdictional Delineation for the Long Point, City of Rancho Palos Verdes, Los Angeles County, California (March 13, 2001 [Revised May 30, 2001]) was provided by Glenn Lukos Associates on June 4, 2001. This document has been reviewed and portions of the document have been summarized and included in the Biological Resources section of the Final EIR.

Pages 5.3-2, 5.3-3, 5.3-8, and 5.3-53 of the Draft EIR have been revised to reflect the Jurisdictional Delineation (refer to Volume IV, *Revised Biological Resources Section*).

- 11O. Refer to Response to Comment Nos. 11F, 11G, and 11K.

- 11P. Page 5.4-18 of the Draft EIR has been revised in the Final EIR as follows:

Thus, it is impossible to judge the full extent of the disturbances or the quantity and quality of the in-place artifact-bearing deposits without an archaeological testing program of scientific excavations to determine the current depth, breadth, and content of the site.

**It should be noted that the rock shelter is located in a planning area that has been designated for conservation purposes. Therefore, it is anticipated that disturbance of the rock shelter would be avoided. In addition,** in order to determine whether the Project would have an effect on Site CA-LAN-103 as a historical resource, an evaluation is required to determine whether or not the site meets the statutory definition of a historical resource. Such a determination would depend upon results of the archaeological testing and evaluation program.

- 11Q. Page 5.4-27 of the Draft EIR, Mitigation Measure 5.4-3, has been revised in the Final EIR as follows:

5.4-3 In the event human remains are discovered during grading/construction activities, work shall cease and ~~an appropriate representative of Native American Indian groups and the County Coroner shall both be informed and consulted, as required by State law.~~ **in the immediate area of the discovery and the Project Applicant shall comply with the requirements and procedures set forth in Section 5097.98 of the Public Resources Code, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant".**

- 11R. According to this comment, additional subsurface investigations were conducted on the postulated landslide in the Upper Point Vicente Area (refer to Draft EIR Exhibit 5.5-2, *Upper Point Vicente Area Geologic Map*). This additional investigation was required in the Draft EIR as Mitigation Measure 5.5-7b.

The additional investigations have demonstrated the absence of a landslide in the area delineated on Exhibit 5.5-2. These additional investigations were addressed in the following reports: *Response to Review Comment by Bing Yen & Associates, Inc.* (Neblett & Associates, March 12, 2001) and *Transmittal Regarding Long Point Parcel* (Neblett & Associates, February 15, 2000). It should be noted that the City of Rancho Palos Verdes' geotechnical reviewer also observed the borings. It was concluded that there is no evidence of a landslide in the southeast corner of the Upper Point Vicente Area. The reports further presented slope stability analyses that demonstrate the area to be stable.

D. Scott Magorien, C.E.G., Engineering Geologist for the Draft EIR has reviewed the reports noted above and has concurred with these findings. Due to the availability of this new data, Exhibit 5.5-2 of the Draft EIR, *Upper Point Vicente Area Geologic Map* has been revised in the Final EIR to reflect the absence of the postulated landslide in the Upper Point Vicente Area (refer to Volume I, *Final EIR*).

Page 5.5-16 of the Draft EIR has been revised in the Final EIR as follows:

A relatively larger landslide labeled "Q1s" as depicted in Exhibit 5.5-2 *UPVA Geologic Map*, has been **was in the past** postulated within the southeast corner of the UPVA. Additional exploratory drilling ~~would be necessary~~ **was conducted** to further evaluate the presence, or absence, of this suspected landslide.<sup>19</sup> **The additional investigations have demonstrated that there is no evidence of a landslide in the southeast corner of UPVA. The reports further presented slope stability analyses that demonstrate the area to be stable.**

Page 5.5-26 of the Draft EIR has been revised in the Final EIR as follows:

In order to evaluate the impact and provide mitigating measures due to the postulated **suspected** landslide located in the southeast corner of the UPVA, a comprehensive subsurface investigation by the Project's geotechnical consultant ~~would be required~~ **was conducted**. ~~Impacts would be reduced to a less than significant level with implementation of mitigation requiring compliance with the building setback line and a comprehensive subsurface investigation.~~ **The results demonstrated the absence of a landslide in the**

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<sup>19</sup> These additional investigations were addressed in the following reports: *Response to Review Comment by Bing Yen & Associates, Inc.* (Neblett & Associates, March 12, 2001) and *Transmittal Regarding Long Point Parcel* (Neblett & Associates, February 15, 2000).

southeast corner of the UPVA and no further mitigation is required. Therefore, a less than significant impact is anticipated in this regard.

Page 5.5-30 of the Draft EIR, Mitigation Measure 5.5-7b, has been revised (omitted) in the Final EIR as follows:

~~5.5-7b Prior to Grading Permit issuance on the UPVA, a comprehensive subsurface investigation shall be conducted by the Applicant's geotechnical consultant regarding the postulated landslide located in the southeast corner of the UPVA. The investigation shall be conducted at Project design level, pursuant to City review requirements, and to the satisfaction of the City's Geotechnical Consultant. The study shall also include preparation of appropriate geologic cross sections to be used to perform slope/landslide stability analysis. Based on the results of the analysis, a mitigation concept/plan shall be implemented.~~

5.5-7**eb** Prior to Grading Permit issuance, the . . . . .

5.5-7**dc** Prior to Grading Permit issuance, the . . . . .

5.5-7**ed** A biannual reconnaissance of the UPVA . . . . .

11S. Page 5.6-27 of the Draft EIR has been revised in the Final EIR as follows:

Schematics of the proposed treatment facilities associated with the development are illustrated in **Figure 6** Exhibit ~~5.6-4~~, *Discharge Pt. 1 Conceptual Drainage System Schematic*, and **Figure 7** Exhibit ~~5.6-5~~, *Discharge Pt. 2 Conceptual Drainage System Schematic*, of **Appendix 15.6, Hydrology and Water Quality Report**.

The Water Quality Management Plan and the Hydrology and Water Quality Technical Appendix which contain more detail on the proposed water quality management plan, including BMPs, are available for review at the City of Rancho Palos Verdes City Hall.

The onsite swales (a Best Management Practice), which are located within the golf course, would be designed specifically to treat runoff from the proposed golf course. The swales would not contain sensitive habitat (they would be comprised of specific vegetation to increase pollutant uptake) and would not irrigate sensitive habitat areas.

The swales are part of a storm drain system that would discharge directly to the Pacific Ocean. There may be a slight increase in salinity levels in the runoff from the golf course areas. However, the amount of runoff from the golf course is minimal in comparison to the significantly higher salinity levels in the water of the Pacific Ocean. Due to the close proximity to the ocean and the fact that the irrigation runoff would not impact habitat areas, the impact to altered salinity levels is considered less than significant.

The reference to spreading grass clippings along the course or wooded areas is an option being considered as part of the WQMP. Wooded areas refers to areas outside of the golf course. Page 5.6-28 of the Draft EIR has been revised in the Final EIR as follows:

A complete routine disposal program would include the collection of grass clippings, which would be dried and then composted or spread along the golf course rough ~~or wooded areas~~.

The dry detention basin is only being considered as a possible option pending further refinement of the WQMP and slope stability analysis. The optional dry detention basins would be located in an off-line condition, so that storm flows would bypass the basin. The treatment BMPs have been designed to treat the "first flush" as required in the Los Angeles County SUSMP.

11T. Page 5.8-43 of the Draft EIR, Mitigation Measure 5.8-1e, has been revised in the Final EIR as follows:

5.8-1e In addition to standard BMP's employed for storm drain construction, the following BMPs shall be implemented during grading/construction activities to ensure that impacts to shoreline habitats and shoreline organisms are avoided:

- All beach vehicular movement shall be limited to the backshore environment behind the lower beach berm **(i.e., behind lower cobbles)**.
- All construction debris shall be removed from the site as often as deemed necessary by the City's Construction Monitor to prevent the material from being washed out to sea on the high tides.
- Coastal protection devices shall minimize intrusion into sand beach habitat. Any sand beach habitat that is disturbed during the construction ~~habitat~~ shall be restored to its natural state following the completion of construction.

- 11U. Comment is noted. The Project Applicant may elect to implement either option identified in Mitigation Measure 5.10-2a, Hole No. 3.

This comment questions why in Kipp Schulties report dated January 23, 2001 there are two different recommendations regarding distances from the property boundary. Moving the second landing area over to the right by 80 to 100 feet is recommended. The intent is to move the second landing area over to the right by an "additional" 80 to 100 feet from where it is shown on the plan. The plan shows this landing area (or the centerline close to the landing area) to be within 70 feet of the property boundary at one point. That is too close. There needs to be an absolute minimum of 150 feet away - more ideally 175 feet away. Accordingly, the recommendation is made of moving this another 80 to 100 (or even 105 feet) to the right. This can be accomplished safely by making the next hole a par three.

Shortly thereafter in the aforementioned report of January 23, 2001, it is stated in the recommendation section (same Page) under Option # 2 that the second landing area be moved a minimum of 150 feet - "ideally 175 feet - away from the property boundary." Moving this landing area by 80 to 105 feet accomplishes the same thing.

- 11V1. The Los Angeles County significant impact threshold has been applied within the traffic study at the direction of the City of Rancho Palos Verdes staff.
- 11V2. Comment is noted. The intersection of Palos Verdes Boulevard (NS) at Palos Verdes Drive West - South (EW) is projected to operate at LOS D for each scenario. Accordingly, Page 5.12-15 of the Draft EIR has been revised in the Final EIR as follows:

- Palos Verdes Boulevard (NS) at: **at Palos Verdes Drive West – North (EW);**  
~~— Palos Verdes Drive West – North (EW);~~  
~~— Palos Verdes Drive West – South (EW);~~

Page 5.12-23 of the Draft EIR has been revised in the Final EIR as follows:

- Palos Verdes Boulevard (NS) at: **at Palos Verdes Drive West – North (EW);**  
~~— Palos Verdes Drive West – North (EW);~~  
~~— Palos Verdes Drive West – South (EW);~~

Page 5.12-25 of the Draft EIR has been revised in the Final EIR as follows:

- Palos Verdes Boulevard (NS) at: **at Palos Verdes Drive West – North (EW);**  
~~Palos Verdes Drive West – North (EW);~~  
~~Palos Verdes Drive West – South (EW);~~

11V3. Refer to Response to Comment No. 11V1.

11V4. Page 5.12-44 of the Draft EIR, Mitigation Measure 5.12-1e, is revised as follows in the Final EIR:

5.12-1e Prior to Occupancy Permit issuance, the Project Applicant shall **make be responsible for their fair share of** the following roadway improvements **as detailed in Table 5.12-11, *Project Fair Share Contribution*, or other such measure(s) as the City determines are necessary to adequately mitigate the project's impacts on the intersection:**

- Silver Spur Road (NS) at Hawthorne Boulevard (EW)
  - Restripe south leg with two left turn lanes, one through lane and one right turn lane and
  - Provide north leg with one left turn lane, two through lanes and one right turn lane
- Hawthorne Boulevard (NS) at Palos Verdes Drive North (EW)
  - Provide west leg with one left turn lane, one shared left/through lane, one through lane and one right turn lane
- Western Avenue (NS) at 25th Street (EW)
  - Provide east leg with one left turn lane, two through lanes and one right turn lane

11W. Section 7.2 of the Draft EIR, *No Project Alternative*, has been revised in the Final EIR in response to the availability of additional details regarding the existing entitlement (refer to Volume I, *Final EIR*).

11X. It should be noted that the Alternative identified by the Applicant as their preferred Alternative was analyzed in Draft EIR Section 7.5, *Relocate Practice Facility - Option "B" Alternative*. As noted in this comment, the Project Applicant intends to modify their applications to reflect as the preferred project a *refined* Alternative 7.5. The Applicant has agreed to modify Alternative 7.5 in response to comments regarding prior promises made to St. Paul's Lutheran Church and/or the Villa Capri residents. Additionally, Alternative 7.5 was modified in an effort to reduce biological impacts and golf safety impacts in the Upper Point Vicente Area. In summary, refinements to this Alternative include the following:

- Increased separation between the golf course and St. Paul's Lutheran Church;
- Revised outline of Hole No. 3 to avoid the mixed sage scrub habitat in the northeastern corner of the Upper Point Vicente Area; and
- Revised outline of driving range.

Accordingly, Section 7.5 of the Draft EIR has been revised in the Final EIR to reflect these modifications (refer to Volume I, *Final EIR*). Further, it should be noted that a detailed evaluation of the Biological impacts associated with Alternative 7.5 has been conducted by Bonterra Consulting and included in Section 7.5 of the FEIR. Also included in Section 7.5 of the FEIR is a detailed evaluation of the golf safety impacts conducted by Kipp Schulties Golf Design, Inc.

11Y. Refer to Response to Comment No. 11R.

**Response to Comment No. 12**

*Softball League Residents*

Diamondback Ten and Under Girls Softball League

March 28, 2001 (Letter incorrectly notes April 28, 2001)

12A. Section 3.0, *Project Description*, describes the proposed Project. A softball field has not been identified as a Project component. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 13**

*Jess Morton, Los Angeles County Director*

Endangered Habitats League

April 6, 2001

13A. As defined in the document, wildlife corridors must "connect" habitat patches. The Draft EIR acknowledges the UPVA's connection to the habitats to the east and the RHA's to the east and west. However, direct connection on the UPVA to open space areas north and west are obstructed by Hawthorne Boulevard, Palos Verdes Drive West, and residential and commercial development. As a result, less mobile wildlife species would be limited in their ability to reach the open space areas to the north and west. More mobile species, such as birds, are less affected by these obstructions and are expected to be able to reach the open space areas north and west of the site that provide suitable habitat for these species.



Regarding wildlife crossings, please note that based on literature<sup>20</sup>, crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. Wildlife crossings are not present across Hawthorne Boulevard to the north of the UPVA or across Palos Verdes Drive to the west and south.

Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife*

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<sup>20</sup>The definitions of wildlife movement terminology were generated from the following sources:

Bennett, A.F. *Habitat corridors and the conservation of small mammals in the fragmented forest environment. Landscape Ecol.* 4:109-122. 1990.

Farhig, L., and G. Merriam. 1985. Habitat patch connectivity and population survival. *Ecology* 66:1,792-1,768.

Harris, L. D., and P.B. Gallagher. 1989. *New Initiatives for Wildlife Conservation; The Need for Movement Corridors.* Pages 11-34 in G. Mackintosh, ed. *Preserving Communities and Corridors.* Defenders of Wildlife., Washington, D.C. 96pp.

MacArthur, R.H., and E.O. Wilson. 1967. *The Theory of Island Biogeography.* Princeton University Press. Princeton, New Jersey.

Noss, R. F. 1983. *A Regional Landscape Approach to Maintain Diversity.* *BioScience* 33:700-706.

Simberloff, D., and J. Cox. 1987. *Consequences and Costs of Conservation Corridors.* *Conser. Biol.* 1:63-71.

Soule, M. E. *Viable Populations for Conservation.* Cambridge Univ. Press, New York, N.Y. 1987.

*nursery sites.* Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation are discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... “the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added).”

Because the City’s NCCP is not adopted, there can not be any identified impact to the NCCP because it is not “adopted.” However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.

As discussed in the Draft EIR, the design of the City's NCCP reserve is currently under development.<sup>21</sup> With guidance and input from the major landowner, local government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered "equal" by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City's preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

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<sup>21</sup> Personal Communication: D. Snow and A. Johnston, September 2000.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

The proposed habitat preservation and restoration outlined above and illustrated on Page 5.3-4 of the Draft EIR increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant palette would only include locally appropriate native species. The steep cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted. The Project design of the UPVA area has maintained a connection to the open space areas off-site. In addition, the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

Comment is noted. *Centromadia* is the current taxonomy for the previous *Hemizonia* species (Novon 9:462-471[1999]) as cited in the CNPS 2000 Electronic Inventory. Minor typographical errors can occur during the preparation of an EIR due to erroneous corrections made during a "spellcheck" by the computer and/or simple human oversight. Minor typographical errors in an EIR do not render an EIR inadequate.

Page 5.3-13, Table 5.3-2, *Special Status Plant Species Potentially Occurring Within the Project Region*, and Page 5.3-22 of the Draft EIR are revised to reflect the correct spelling of *Aphanisma blitoides* (refer to Volume IV, *Revised Biological Resources Section*).

Pages 5.3-2 and 5.3-26, and Page 5.3-15, Table 5.3-3, *Special Status Wildlife Species Potentially Occurring Within the Project Region*, of the Draft EIR have been revised to reflect the correct spelling of *Glaucopsyche lygdamus palosverdesensis* (refer to Volume IV, *Revised Biological Resources Section*).

Pages 5.3-2 and 5.3-26 of the Draft EIR have been revised to reflect the correct plant which is associated with the El Segundo blue butterfly (*Euphilotes battoides allyni*): coast buckwheat (*Eriogonum parvifolium*) (refer to Volume IV, *Revised Biological Resources Section*). Additionally, the discussion regarding this issue has been revised.

A list of the plant species observed on the Project site during the verification surveys conducted by BonTerra Consulting on August 22 and September 1, 2000, focused special status plant surveys conducted by Dudek & Associates in 1998, and butterfly host plant surveys conducted by Dudek & Associates on June 15, 1999 has been included in Appendix 15.3 of the Final EIR, *Biological Resources*. In addition, a list of wildlife species observed or expected to occur onsite has also been incorporated.

#### **Response to Comment No. 14**

*Alyda White, President*

League of Women Voters of Palos Verdes Peninsula

March 14, 2001

- 14A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

#### **Response to Comment No. 15**

*Board of Directors*

Palos Verdes Girls Softball League

March 27, 2001

- 15A. Section 3.0, *Project Description*, describes the proposed Project. A softball field has not been identified as a Project component. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

Additionally, the softball complex illustrated on the exhibit enclosed with this comment is located outside the proposed Project limits.

**Response to Comment No. 16**

*Juan Torres, President*

Palos Verdes Peninsula Girls Softball League (PVPGSL)

March 13, 2001

- 16A. Section 3.0, *Project Description*, describes the proposed Project. A softball field has not been identified as a Project component. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

Additionally, the softball complex illustrated on the exhibit enclosed with this comment is located outside the proposed Project limits.

These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 17**

*Barry Holchin, Conservation Chair*

Sierra Club Palos Verdes South Bay Group

March 13, 2001

- 17A. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 17B. Section 7.0, *Alternatives to The Proposed Project*, has been expanded to include Alternative 7.10, *Point Vicente Park Enhancement and Existing Entitlement Alternative*.
- 17C. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 17D. The Project would be subject to compliance with energy conservation measures in accordance with Title 24 of the California Administrative Code. The energy conservation measures described in this comment are permitted if the Applicant so chooses to implement them, however, these would not be a requirement.
- 17E. As defined in the document, wildlife corridors must "connect" habitat patches. The Draft EIR acknowledges the UPVA's connection to the habitats to the east and the RHA's to the east and west. However, direct connection on the UPVA to open space areas north and west are obstructed by Hawthorne Boulevard, Palos Verdes Drive West, and residential and commercial development. As a result, less mobile wildlife species would be limited in their ability to reach the open space areas to the

north and west. More mobile species, such as birds, are less affected by these obstructions and are expected to be able to reach the open space areas north and west of the site that provide suitable habitat for these species.

Regarding wildlife crossings, please note that based on literature<sup>22</sup>, crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. Wildlife crossings are not present across Hawthorne Boulevard to the north of the UPVA or across Palos Verdes Drive to the west and south.

Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites*. Based on the thresholds established, the proposed Project does not

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<sup>22</sup>The definitions of wildlife movement terminology were generated from the following sources:

Bennett, A.F. *Habitat corridors and the conservation of small mammals in the fragmented forest environment*. *Landscape Ecol.* 4:109-122. 1990.

Farhig, L., and G. Merriam. 1985. Habitat patch connectivity and population survival. *Ecology* 66:1,792-1,768.

Harris, L. D., and P.B. Gallagher. 1989. *New Initiatives for Wildlife Conservation; The Need for Movement Corridors*. Pages 11-34 in G. Mackintosh, ed. *Preserving Communities and Corridors*. Defenders of Wildlife., Washington, D.C. 96pp.

MacArthur, R.H., and E.O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton University Press. Princeton, New Jersey.

Noss, R. F. 1983. *A Regional Landscape Approach to Maintain Diversity*. *BioScience* 33:700-706.

Simberloff, D., and J. Cox. 1987. *Consequences and Costs of Conservation Corridors*. *Conser. Biol.* 1:63-71.

Soule, M. E. *Viable Populations for Conservation*. Cambridge Univ. Press, New York, N.Y. 1987.

interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation are discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... “the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added).”

Because the City’s NCCP is not adopted, there can not be any identified impact to the NCCP because it is not “adopted.” However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.



As discussed in the Draft EIR, the design of the City's NCCP reserve is currently under development.<sup>23</sup> With guidance and input from the major landowner, local government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered "equal" by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City's preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

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<sup>23</sup> Personal Communication: D. Snow and A. Johnston, September 2000.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

The proposed habitat preservation and restoration outlined above and illustrated on Page 5.3-4 of the Draft EIR increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant palette would only include locally appropriate native species. The steep cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted. The Project design of the UPVA area has maintained a connection to the open space areas off-site. In addition, the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

As noted in Section 3.0, *Project Description*, no netting of the golf course or golf practice facility is proposed or required.

As discussed in Section 5.13, *Recreation*, and 5.7, *Land Use and Relevant Planning*, the proposed Project would not conflict with the policies and recommendations identified in the General Plan and Coastal Specific Plan with respect to coastal access. Analysis has concluded that the Project would be consistent with the recommendations and a less than significant impact would occur.

- 17F. As noted in Section 5.10, *Public Health and Safety*, a Peer Review and Safety Analysis for the Long Point Resort Course and Practice Facility was conducted by Kipp Schulties Golf Design, Inc., (September 15, 2000). The analysis was conducted to confirm that the layout, routing and grading would not conflict with safety as it relates to residential units, adjacent holes, streets, and pedestrian traffic. The analysis concluded that the potential for conflict with errant shots landing on or near the pedestrian trails existed in certain areas (i.e., Holes #3, #5 and #9). This impact would be considered significant unless mitigated. With implementation of the specified Mitigation Measures, impacts in this regard would be reduced to less than significant levels.

Exhibit 5.13-1, *Proposed Recreational Facilities*, illustrates the location of the proposed pedestrian trails, including the following which are located in proximity to major roadways:

- Un-named Trail (off-site pedestrian trail along Hawthorne Boulevard);
- Salvation Army Trail (pedestrian trail along Palos Verdes Drive South);
- Marineland Trail (joint-use [pedestrian and bicycle]) situated along Palos Verdes Drive South; and
- Un-named Trail (multi-use [pedestrian and equestrian] situated along Palos Verdes Drive South, parallel to Marineland Trail.

As noted in Section 5.13, *Recreation*, analysis has concluded that the trails (and their alignment) proposed as part of the Long Point Resort Project would be consistent with the policies and recommendations identified in the General Plan, Coastal Specific Plan, Conceptual Trails Plan, and Conceptual Bikeways Plan.

The proposed development is comprised of 11.1 miles of new public bicycle trails, equestrian trails, pedestrian trails/stairways, and coastal access ramps. Of these 11.1 miles of trails, 7.9 miles would be open to public access consistent with City of Rancho Palos Verdes Development Code 12.16.030 pertaining to parks and parklands as follows: "*No person shall remain in any park between one hour after sundown and one hour before sunrise*". The remaining 3.2 miles comprising golf cart paths would be available for use by the general public during non-golfing hours.

With respect to the request to establish a trail committee, both the Conceptual Bikeways Plan (Revised 1996) and the Conceptual Trails Plan (Revised September 1993) were developed by the City of Rancho Palos Verdes Recreation Department along with the involvement of a recreation/parks committee. Thus, these plans were a cooperative effort and are reflective of the public's concerns.

- 17G. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 18**

*Barry Holchin, Conservation Chair*

Sierra Club, Palos Verdes - South Bay Group, Angeles Chapter

April 6, 2001

18A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

18B. A General Plan Amendment on the UPVA changing the land use designation from Recreational Passive to Recreational Active is considered a less than significant impact for the following reasons:

- As detailed in Table 5.7-2, *General Plan Consistency Analysis*, the proposed Project is considered consistent with all of the applicable goals and policies in the General Plan;
- The General Plan Urban Environment Element contains recommendations for development which pertain to the UPVA. These are outlined in the *Existing Conditions* discussion in Section 5.7, *Land Use and Relevant Planning*. This Element identifies areas set aside in the City for a structured use. The UPVA is a designated Recreational Activity area: the Project proposes development of recreational uses in this area and, therefore, would be consistent with the designated use;
- The Urban Environment Element recommends the incorporation of active recreational facilities at the lower Nike Site: the Project proposes that the overall use of the UPVA be a golf course which is an active recreational use. Therefore, the proposed Project would be considered consistent with this recommendation
- The Urban Environment Element recommends that the Nike Site be designated for park purposes: the Project proposes the development of passive parkland (a total of 2.2 acres of passive parkland), pedestrian trails and scenic view points on the UPVA, as well as a golf course and practice facility. Therefore, the proposed Project would be considered consistent with this recommendation.

As the analysis has concluded that the proposed Project would not conflict with the policies and regulations of the City of Rancho Palos Verdes General Plan, and the recommendations for development which pertain to the UPVA, development of the proposed golf course and practice facility on the UPVA would not be considered a significant land use impact with approval of the General Plan Amendment. Further, it should be noted that the General Plan currently contemplates the uses proposed by the Applicant for the UPVA and provides a mechanism for implementing the proposed uses.

- 18C. As noted in Section 5.7, *Land Use and Relevant Planning*, the pedestrian trails, scenic view points, and public park areas proposed in the UPVA are uses permitted within the Open Space Recreational District (OR) (Section 17.34). The proposed golf course, driving range and related ancillary uses may be constructed within this district by Conditional Use Permit (CUP). The proposed Project would be in compliance with this category upon issuance of a CUP.

As part of the Plan Review process, the proposed Project would be required to demonstrate compliance with the specified development standards for the OR District regarding lot size, building height, lot coverage and parking. The proposed Project would result in a less than significant impact after compliance with the specified standards.

All of these proposed recreational facilities would be designated for public use. This would be consistent with the Deed requirement that the UPVA be maintained for public purposes. In addition, the proposed golf course and practice facility would be public and available for use by the resort hotel guests, residents and visitors.

The proposed development is comprised of 11.1 miles of new public bicycle trails, equestrian trails, pedestrian trails/stairways, and coastal access ramps. Of these 11.1 miles of trails, 7.9 miles would be open to public access consistent with City of Rancho Palos Verdes Development Code 12.16.030 pertaining to parks and parklands as follows: “*No person shall remain in any park between one hour after sundown and one hour before sunrise*”. The remaining 3.2 miles comprising golf cart paths would be available for use by the general public during non-golfing hours.

Additional comments are noted and will be considered by the City of Rancho Palos Verdes.

- 18D. As detailed in Section 5.7, *Recreation*, the Project’s proposed recreational facilities include both active and passive recreational uses, some of which are established in the POU for the UPVA. Based on the POU detailed in Table 5.7-1, *Program of Utilization*, and illustrated Exhibit 5.7-4, *Program of Utilization Conceptual Plan*, the recreational uses proposed by the Project which are considered generally consistent with the POU include the following:

- Hiking/Jogging Trails. The Project proposes the development of pedestrian trails in the UPVA;
- Lookout Points. The Project proposes five scenic view points in the RHA;

- Picnic Areas & Open Play Areas. The Project proposes these recreational uses at two locations the City Hall Park Expansion (Planning Area 2-F) and the Point Vicente Overlook (Planning Area 2-G); and
- Natural Areas. The Project proposes approximately 24.9-acres to be conserved, enhanced and created as Coastal Sage Scrub habitat (Upper Point Vicente Area Coastal Sage Scrub Habitat (PA 1-B)) in the UPVA.

All of these proposed recreational facilities would be designated for public use. This would be consistent with the Deed requirement that the UPVA be maintained for public purposes. In addition, the proposed golf course and practice facility would be public and available for use by the resort hotel guests, residents and visitors.

The Project proposes that approximately one-half of the UPVA be developed with a golf course. This would be considered inconsistent with the POU since a golf course was not an identified recreational use in the POU. Further, the Deed established the requirement that the property be used and maintained for the public purposes for which it was conveyed as set forth in the POU. This inconsistency would be considered a significant impact unless mitigated. However, as the Deed further authorized amendments to the POU provided written concurrence is first obtained from the Secretary of the Interior, mitigation that requires obtaining this approval be obtained prior to Project implementation would reduce impacts to less than significant levels.

Page 5.7-34 of the Draft EIR has been revised in the Final EIR as follows:

The Project proposes that **approximately one-half of** the UPVA be developed ~~primarily~~ with a golf course. . . . However, as the Deed further authorized amendments to the POU provided written concurrence ~~was~~ **is first** obtained from the Secretary of the Interior, mitigation ~~requiring that~~ **requires obtaining** this approval ~~be obtained~~ prior to Project implementation would reduce impacts to less than significant levels.

- 18E. Refer to Response to Comment Nos. 18B, 18C and 18D. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 18F. As noted in Section 5.7, *Land Use and Relevant Planning*, the City of Rancho Palos Verdes Zoning Ordinance, Title 17 of the Municipal Code, identifies land uses permitted and prohibited according to the zoning category of the RHA. An analysis was conducted to evaluate the Project's compliance with each category. The resort/conference hotel, and golf course proposed in the RHA may be constructed within the Commercial Recreational District (CR) with a Conditional Use Permit. The proposed Project would be in compliance with this category upon issuance of a CUP.

Since the proposed resort hotel would be located within the Coastal Specific Plan District, it would be required to provide public access to and along the bluff. The Project proposes two shore access points and a coastal access trail. Additionally, the Project proposes the Long Point Trail which is situated along the bluff. Therefore, the proposed Project would be in compliance with these requirements.

As part of the Plan Review process, the proposed Project would be required to demonstrate compliance with the specified development standards for the CR District regarding lot area, landscaping, design, and height. The proposed Project would result in a less than significant impact after compliance with the specified standards.

The Project does not propose the development of permanent structures within this District, although, the development of pedestrian trails is proposed. Pedestrian trails would be considered a limited recreational use which would be permitted in the Open Space-Hazard District (OH), provided, that the applicable Natural Overlay Control District (OC-1) performance criteria are satisfied.

Additionally, refer to Response to Comment Nos. 18B, 18C and 18D.

Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration.

18G. Refer to Response to Comment No. 1D and 1G.

18H. Comments are noted and will be considered by the City of Rancho Palos Verdes.

18I. 1. A list of the plant species observed on the Project site during the verification surveys conducted by BonTerra Consulting on August 22 and September 1, 2000, focused special status plant surveys conducted by Dudek & Associates in 1998, and butterfly host plant surveys conducted by Dudek & Associates on June 15, 1999 has been included in Appendix 15.3 of the Final EIR, *Biological Resources*. In addition, a list of wildlife species observed or expected to occur onsite has also been incorporated.

Seacliff buckwheat is present on the RHA within the southern coastal bluff scrub vegetation type. Focused surveys on the Project site have been conducted to assess the UPVA and RHA for potential habitat for the federally Endangered Palos Verdes blue (PVB, *Glaucopsyche lygdamus palosverdesensis*), and to determine presence or absence of PVB on the site. This species was not observed during focused survey efforts conducted during the Spring of 2001 by BonTerra Consulting. Therefore, Project implementation would not result in any impacts on this species.

It should be noted that focused surveys for the El Segundo blue (*Euphilotes battoides allyni*) to determine this species presence/absence from the site are currently in progress. Survey results shall be incorporated into Volume IV, *Revised Biological Resources Section*, upon completion of the survey effort.

Pages 5.3-2, 5.3-25, 5.3-26, 5.3-48, and Page 5.3-65, Mitigation Measure 5.3-1c, of the Draft EIR have been revised to reflect the focused surveys for the Endangered Palos Verdes blue and El Segundo blue (refer to Volume IV, *Revised Biological Resources Section*).

2. As stated in the Survey Methodologies section under 5.3, *Biological Resources* of the Draft EIR, the surveys that were conducted by BonTerra Consulting were not considered focused special status plant surveys but rather general reconnaissance field surveys to review and verify the information previously prepared for the Project site by Dudek & Associates. Dudek & Associates conducted focused special status plant surveys in 1998. According to the Dudek report, reasonably intact habitats on the site were surveyed during a period when most, if not all, of the potentially-occurring special status plant species would be evident, if not blooming. Based on the Significance Criteria establish for this project pursuant to the CEQA Guidelines, an appropriate evaluation of potential impacts on special status plant species known to occur onsite or with a potential to occur onsite was prepared.

The documentation of the existing conditions on the Project site are accurate, thorough, and consistent with industry standards and documentation requirements of the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG).

The proposed Project would not result in the removal of “all appropriate habitat” or the extirpation of any of the plant or wildlife species known or expected to occur on the Project site.

3. The annual grassland on the Project site is dominated by non-native grasses including slender wild oat (*Avena barbata*), wild oat (*Avena fatua*), common ripgut grass (*Bromus diandrus*), foxtail chess (*Bromus madritensis* ssp. *rubens*), Bermuda grass (*Cynodon dactylon*), and shortpod mustard (*Hrschfeldia icana*). The disturbed habitats consist of areas that previously contained Marineland Aquatic Park structures and areas that are cleared for fire control on a routine basis. These areas are also characterized by weedy non-native and native species including short pod mustard, slender wild oat, Australian saltbush (*Atriplex semibaccata*), fennel (*Foeniculum vulgare*), castor-bean (*Ricinus communis*), garland chrysanthemum (*Chrysanthemum coronarium*), Bermuda grass, ripgut grass, statice (*Limonium perezii*), big



saltbush, nasturtium (*Trapaeolum majus*), horseweed (*Conyza canadensis*), horehound (*Marrubium vulgare*), and rat-tail fescue (*Vulpia myuros*). Because these areas are dominated by non-native grasses and forbs, including many species considered invasive weeds, and these habitat types are common throughout Southern California, these areas are considered of low biological value.

4. Impacts to scrub communities were identified as significant and appropriate mitigation to reduce these impacts to a level of less than significant was included in the Draft EIR.
5. Thresholds of Significance for biological resources were incorporated from Appendix G of the CEQA Guidelines, Initial Study Environmental Checklist. With regards to special status species, a project may create a significant environmental impact if..... “the project has a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Game and Wildlife Service” (emphasis added).

An evaluation of whether an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be those that would substantially diminish, or result in the loss of, an important biological resource or those that would obviously conflict with local, State or Federal resource conservation plans, goals, or regulations. Impacts are sometimes locally adverse but not significant because, although they would result in an adverse alteration of existing conditions, they would not substantially diminish or result in the permanent loss of an important resource on a population- or region-wide basis.

The finding that some special status species would not be significantly impacted by the proposed Project included an evaluation of the species listing status, habitat requirements and distribution, potential threats to the species, and local or regional open space areas/plans that have provided for the conservation of a particular species/habitat type. Projects under CEQA review rely on information from the USFWS and CDFG regarding the “survival of that species” by the evaluation of project impacts to species listed by these agencies as Threatened or Endangered.

6. Pages 5.3-45 and -46 of the Draft EIR state the following in regards to impacts to “threatened plant and animal species”: Section 15065(a), *Mandatory Findings of Significance*, of the CEQA Guidelines states that a project may have a significant effect on the environment if “...the project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species...” (underlining added). Impacts to state or federally listed species or those species that meet the criteria as defined by CEQA were identified as significant in the Draft EIR. Mitigation to reduce the impacts to a less than significant level was also provided.

In regards to significant impacts on “important corridors”, Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites*. Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site would be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

Mitigation to address potential indirect impacts to native habitat types and special status plant and wildlife species by the proposed golf course uses are identified in Mitigation Measures 5.3-2a, 5.3-2c through e, and 5.3-2g. Implementation of the Mitigation Measures would reduce the potential disturbance of the golf course activities to less than significant.

Also, refer to Response to Comment Nos. 18I-2 and 18I-3.

7. The “mitigation” for the proposed Project is not solely contained within the Mitigation Measures within the Draft EIR, but as Project design features. The design features of the proposed Project include the avoidance of some of the special status plant communities onsite and the implementation of the LPHCP. The proposed Project would required the approval of the LPHCP by the USFWS, CDFG, and City, prior to project construction. Refer to Mitigation Measures 1d and 2a of the Draft EIR. This plan, when finalized,

would contain all necessary details to ensure that impacts to coastal sage scrub and the gnatcatcher are mitigated. The Mitigation Measures specified in Draft EIR and as modified as part of the Response to Comments are adequate to identify that proposed project can be mitigated to a level of less than significant.

8. The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... “the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added).”

Because the City’s NCCP is not adopted, there can not be any identified impact to the NCCP because it is not “adopted.” However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.

As discussed in the Draft EIR, the design of the City’s NCCP reserve is currently under development.<sup>24</sup> With guidance and input from the major landowner, local government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered “equal” by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City’s preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

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<sup>24</sup> Personal Communication: D. Snow and A. Johnston, September 2000.

- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

9. It has been documented<sup>25</sup> that restored sage scrub and other habitat types, when done in a biologically sound manner and under supervision of a qualified biologist with experience in native plant restoration, can and will support a wide variety of native plant and animal species including those listed as threatened or endangered by the state and federal regulatory agencies. The creation of habitat is an approved form of mitigation by the regulatory agencies and is often a component of compensation/mitigation plans that are processed with these agencies. Because of the mitigation of the proposed plan, including preservation, restoration, and protection of retained native habitats, it is expected that the proposed Project site would continue to support the gnatcatcher both for breeding and dispersal activity.

The proposed habitat preservation and restoration outlined in the Draft EIR and illustrated on 5.3-4 increases the size of the sage scrub patches currently present on the UPVA, thus reducing the existing and potential fragmentation of native habitat patches on the Project site. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

Mitigation Measure 5.3-1d identifies that the project applicant shall comply with the Federal Endangered Species Act (FESA) with regards to any impacts to the coastal California gnatcatcher, which is known to occur in the sage scrub habitat onsite. The commitment of the project applicant would be ensured by the U.S. Fish and Wildlife Service's (USFWS) enforcement of this act and the permit conditions that would apply to the proposed Project. Any permit to remove habitat and or impact a federally listed threatened or endangered species requires monitoring of the proposed action and reporting requirements for any proposed habitat restoration program. If the project applicant does not meet the success criteria established for the restoration program, the USFWS may require additional mitigation.

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<sup>25</sup> November 21, 2001. Year-end Report for the Ocean Trails HCP Area California Gnatcatcher Study, City of Rancho Palos Verdes, Los Angeles County, California - Permit # PRT-800922.

The proposed mitigation approach for the UPVA and RHA is based on two main concepts of open space planning regarding natural resources : (1) preserve high value areas to the greatest extent possible and (2) enhance those areas with native habitat that currently do not support high biological value. These general concepts have been applied to both the LPHCP and the mitigation program for the Draft EIR.

10. Mitigation to address potential indirect impacts, including edge effects, to native habitat types and special status plant and wildlife species by the proposed golf course uses are identified in Mitigation Measures 5.3-2a, 5.3-2c through e, and 5.3-2g. Implementation of these measures would reduce the potential disturbance of the golf course activities to less than significant.
11. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.
12. The definitions of wildlife movement terminology were generated from the following sources:

Bennett, A.F. *Habitat corridors and the conservation of small mammals in the fragmented forest environment. Landscape Ecol.* 4:109-122. 1990.

Farhig, L., and G. Merriam. 1985. Habitat patch connectivity and population survival. *Ecology* 66:1,792-1,768.

Harris, L. D., and P.B. Gallagher. 1989. *New Initiatives for Wildlife Conservation; The Need for Movement Corridors*. Pages 11-34 in G. Mackintosh, ed. *Preserving Communities and Corridors*. Defenders of Wildlife., Washington, D.C. 96pp.

MacArthur, R.H., and E.O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton University Press. Princeton, New Jersey.

Noss, R. F. 1983. *A Regional Landscape Approach to Maintain Diversity*. *BioScience* 33:700-706.

Simberloff, D., and J. Cox. 1987. *Consequences and Costs of Conservation Corridors*. *Conser. Biol.* 1:63-71.

Soule, M. E. *Viable Populations for Conservation*. Cambridge Univ. Press, New York, N.Y. 1987.

13. As discussed on Page 5.3-43, at the present time, there are no remaining acres of coastal sage scrub in the City NCCP subregion that can be removed under the 4(d) special rule. Therefore, it is unlikely that the proposed Project can be processed through Section 4(d) of the FESA unless the projects that have already received 4d authorization do not proceed or the USFWS issues another Biological Opinion that allows for the additional take of habitat within the subregion, which at this time appears unlikely. Therefore, mitigation/compensation for the loss of coastal sage scrub and gnatcatchers would need to be coordinated with the USFWS and another federal responsible involved in the Project through Section 7 of the FESA or with the USFWS through Section 10 of the FESA. The City cannot preclude the project applicant from submitting permits for development to the USFWS.
  
14. As stated on Page 5.3-59 of the Draft EIR, noise levels in the Project site would increase over present levels during construction of the proposed Project. During construction, temporary noise impacts have the potential to disrupt foraging, nesting, roosting, and denning activities for a variety of wildlife species. Because most species in the vicinity of the Project site are not listed as Threatened or Endangered by state or federal resource agencies, these impacts are not considered significant. However, the coastal California gnatcatcher, raptor species, and cliff nesting and roosting species (i.e., peregrine falcon, California gull, osprey, California brown pelican, and double-crested cormorant) either occur or potentially occur within proposed natural open space areas on the UPVA and RHA sites. These species would incur temporary short-term impacts from construction noise, if present in the vicinity of the Project site, and may be temporarily displaced due to these disturbances. Indirect noise impacts on these species would be considered significant because these species are protected by federal and state wildlife agencies. Impacts on these species would be reduced to less than significant levels with implementation of the specified mitigation. Page 5.3-70, Mitigation Measure 5.3-2j, of the Draft EIR has been revised to include grading restrictions that are typically required by the U.S. Fish and Wildlife Service (refer to Volume IV, *Revised Biological Resources Section*).

Noise would also increase over present levels with implementation of the proposed Project resort and recreational uses. The Project site is currently periodically disturbed by noise: the RHA is currently used by the movie industry and the UPVA is located adjacent to the Rancho Palos Verdes City Hall. Further, Palos Verdes Drive South bisects the two Project areas (i.e., the UPVA and RHA). Although noise adjacent to the Project site would increase over current noise levels, and would become more constant, this increase would not be such that it would substantially reduce common wildlife populations in the region. Therefore, a significant impact is not anticipated in this regard.

Species that roost or nest along cliffs and the rocky shore of the proposed open space areas may be indirectly impacted by the increase in noise on the RHA. This impact would be potentially significant. Implementation of the specified mitigation requiring that a landscaping buffer be planted along the boundary of developed land uses would reduce this impact to less than significant. The landscape buffer would provide native and/or drought tolerant non-invasive plant species to reduce potential indirect effects on cliff/shore nesting species.

15. As noted in Section 5.6 of the Draft EIR, *Hydrology and Drainage*, development of the Long Point Resort may result in long-term impacts to the quality of storm water and urban runoff, subsequently impacting water quality. Impacts would be reduced to less than significant levels with incorporation of the proposed Water Quality Management Plan, the specified Mitigation Measures, and State, County, and City requirements.

As noted in Section 5.5, *Geology and Soils*, the potential for the accumulation of groundwater beneath the Project area due to infiltration of landscape irrigation, storm water runoff, etc. appears to be unlikely given the pervasive fracturing of the bedrock beneath the area. However, the addition of storm water runoff, landscape irrigation for the golf course and resort areas, etc., could result in the localized building up of groundwater beneath the Project area. With the buildup of groundwater comes the increased potential of localized failures on the bluffs and/or reactivation of existing landslides due to the buildup of pore pressure in the rock and soil, and the possibility of groundwater acting to lubricate weak rock and soil layers. This impact would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation requiring groundwater monitoring wells and periodic visual reconnaissance.

Refer also to Response to Comment No. 18I.14.

16. As stated on Page 5.3-60 of the Draft EIR, lighting of the proposed Project in certain areas (hotel and practice facility) would inadvertently result in an indirect effect on the behavioral patterns of nocturnal and crepuscular (i.e., active at dawn and dusk) wildlife that are present along the boundaries of the urban and natural areas of the UPVA and RHA. Of particular concern is the effect on small ground-dwelling animals that use the darkness to hide from predators, and on owls, which are specialized night foragers. In addition, the increase in night lighting could discourage nesting and roosting along the cliffs and rocky shore adjacent to the RHA. This increased lighting, in conjunction with the increased noise and habitat loss, would be considered potentially significant since it is adjacent to cliff nesting and roosting habitat. Implementation of the specified mitigation requiring that a lighting plan be prepared which directs lighting away from sensitive biological resources would reduce this impact to less than significant.



17. Mitigation to address potential indirect impacts (including disturbance by golfers) to native habitat types and special status plant and wildlife species by the proposed golf course uses are identified in Mitigation Measures 5.3-2a, 5.3-2c through e, and 5.3-2g. Implementation of the above measures would reduce the potential disturbance of the golf course activities to less than significant.
18. Page 5.3-67 of the Draft EIR, Mitigation Measure 5.3-2a, has been revised to reduce the potential for non-native plants to invade the natural open space on the Project site (refer to Volume IV, *Revised Biological Resources Section*).
19. The grading limits provided to the EIR consultant contained an area of grading in very close proximity to the coastal bluff scrub onsite, impacting approximately 0.10 acre. However, the Project Applicant has indicated that the grading limits of the proposed Project would be modified to avoid any impact to this habitat type.
- 18J. This comment correctly restates the Draft EIR by saying that the Project would produce significant air emissions, both during the construction phase (short-term impacts) as well as during the operational phase (long-term impacts). Responses to this comment are categorized below according to short-term impacts and long-term emissions.

Short-term Impacts: Table 5.2, *Construction Emissions*, refers to Appendix 15.2 of the Draft EIR which contains the URBEMIS7G Computer Model results of the short-term air emissions estimates. This comment states that complete horsepower information for the types of construction equipment included in the impact analysis were not available in the Draft EIR. The URBEMIS7G model is recommended for use by the SCAQMD and is based on emission factors contained in EPA's AP-42 document, the same document referred to in this comment. The construction emissions are appropriately compared to the SCAQMD's pounds per day thresholds (and quarterly construction thresholds). The Draft EIR states that adherence to the City Development Code and SCAQMD Rules is required to reduce construction-related impacts although impacts for nitrogen oxides (NO<sub>x</sub>) and fine particulate matter (fugitive dust) would remain significant following implementation of measures. As such, NO<sub>x</sub> emissions would be the only construction-related pollutant from equipment exhaust which would exceed SCAQMD thresholds. Although mitigation in the form of proper maintenance of construction equipment would reduce emissions from construction equipment (i.e., CO, ROG, NO<sub>x</sub>, and PM<sub>10</sub>) by approximately 10 pounds per day, these measures would not reduce the emissions to below SCAQMD thresholds. This comment also states that the proposed Project would be eligible for the SCAQMD RECLAIM program if it were an industrial facility. Since this Project is not an industrial project and RECLAIM deals only with industrial projects, this comment does not apply.

Long-term Impacts: This comment concurs with the Draft EIR by stating that long-term air quality impacts from the Project would be significant. Table 5.2-4 of the EIR indicates that SCAQMD thresholds for reactive organic compounds (ROG), NO<sub>x</sub>, and carbon monoxide (CO) would exceed SCAQMD thresholds. As also shown in this Table, the predominant concentration of Project-emitted long-term pollutants would be from motor vehicles and not from stationary sources. Stationary source emissions generated by the Project would not exceed established thresholds. This comment letter states that if the Project were an industrial facility, offsets would be required and the Federal EPA's Title V thresholds would apply.

SCAQMD Rule 3000(b)25 - Reported Emissions, in part, states

“...The following types of reported emissions shall not be considered in determining whether a facility is required to obtain a Title V [Federal Operating Permit Program for Major Sources] permit:

(A) Fugitive emissions of VOC, oxides of nitrogen (NO<sub>x</sub>), oxides of sulfur (SO<sub>x</sub>), carbon monoxide (CO) or PM-10 unless the source belongs to one of the categories listed in paragraph 2 of the definition of major source in 40 CFR Part 70, Section 70.2...

(B) Emissions from on-road and off-road mobile equipment, as defined in Rule 219 - Equipment Not Requiring a Written Permit Pursuant to Regulation II.”

Per the aforementioned 40 CFR Part 70, Section 70.2 (definitions),

“Major source means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person (or persons under common control)) belonging to a single major industrial grouping and that are described in paragraph (1), (2), or (3) of this definition. For the purposes of defining ‘major source,’ a stationary source or group of stationary sources shall be considered part of a single industrial grouping...”

Per the aforementioned SCAQMD Rule 219, motor vehicles as associated with the proposed Project do not require a written permit pursuant to Regulation II. The proposed Project type also is not included in the categories listed in paragraph 2 of the definition of major sources in 40 CFR Part 70, Section 70.2. Since this Project is not an industrial facility and the predominant source of long-term emissions would be from vehicular sources (as compared to stationary sources associated with industrial facilities), this comment is not applicable to the proposed Project.

18K. Refer to Response to Comment No. 18I-15.

18L. Based on a review of Exhibit 5.11-1, *Resort Hotel Infrastructure Plan*, and Exhibit 5.5-1, *Resort Hotel Area Geologic Map*, there appears to be an adequate amount of setback from the top of the bluff and the headscarp area of the shallow landslides shown on the geologic map. Moreover, given the highly fractured nature of the bedrock and the absence of laterally continuous weak clay beds (i.e. bentonite / tuffaceous clay), infiltration of water from a leaky sewer or water line would likely not buildup significant hydrostatic pressures within the underlying bedrock/landslide materials. It would be the responsibility of the geotechnical and civil design consultants to consider the impacts of bluff erosion, slope creep, as well as other aspects concerning maintaining the integrity and long-term stability of any off-site sewage/water conveyance pipelines for the Project during the design phase.

Page 5.3-53 of the Draft EIR has been revised with respect to utility lines crossing habitat areas (refer to Volume IV, *Revised Biological Resources Section*).

18M. Refer to Response to Comment No. 17F.

18N. Comments are noted and will be considered by the City of Rancho Palos Verdes.

18O. It should be noted that the Alternative recently identified by the Applicant as their preferred Alternative was analyzed in Draft EIR Section 7.5, *Relocate Practice Facility - Option "B" Alternative*. The Project Applicant intends to modify their applications to reflect as the preferred project a *refined* Alternative 7.5. The Applicant has agreed to modify Alternative 7.5 in response to comments regarding prior promises made to St. Paul's Lutheran Church and/or the Villa Capri residents. Additionally, Alternative 7.5 was modified in an effort to reduce biological impacts and golf safety impacts in the Upper Point Vicente Area.

Refer also to Response to Comment No. 1G.

18P. Comments are noted and will be considered by the City of Rancho Palos Verdes.

18Q. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 315**

Steve Smith, Ph.D., Program Supervisor

South Coast Air Quality Management District

April 20, 2001

315A. As indicated in Volume II of the Draft EIR, Section 15.2, *Air Quality Data*, nearly 70 percent of the estimated construction-related NOx emissions would be generated by site grading activities with the remaining 30 percent generated by mobile construction equipment. According to Chapter 11 of the CEQA Air Quality Handbook (Table 11-3), seven Mitigation Measures are offered related to off-road mobile emission sources. Of these seven measures, two measures do not include reductions for NOx emissions. Implementation of three other measures would actually increase NOx emissions. The remaining two measures both involve the use of electricity from power poles rather than temporary gasoline power generators or from diesel power generators. A substantial reduction in NOx emissions (efficiency factors of 96 percent and 97 percent, respectively) would occur with implementation of these measures. In light of the current energy situation in California, the use of electricity from power poles during construction is not considered feasible and, as such, were not recommended in the Draft EIR.

Page 5.2-13 (paragraph 2) of the Draft EIR states that “Even with implementation of City Code 17.76.020 and 17.76.040(G)(4) regarding dust control techniques (daily watering, covering of trucks, etc.), limitations on construction hours, and installation of temporary construction fencing, and adherence to SCAQMD Rule 403 (requires watering for inactive and perimeter areas, track out requirements, etc.), impacts from PM10 fugitive dust would remain a significant impact.” The “credit” for Mitigation Measures referenced in this comment in the computer modeling are required as part of either the City Development Code or SCAQMD requirements. As requested by the SCAQMD, Mitigation Measure 5.2-1 of the Draft EIR, which includes PM10 reducing measures from Chapter 11 of the SCAQMD CEQA Handbook, has been revised in the Final EIR as follows to further clarify required air quality Mitigation Measures:

- 5.2-1 ~~Additional measures beyond adherence to City Development Code and SCAQMD Rules are not required.~~ **In accordance with the City Development Code and SCAQMD Rules, the Project Applicant shall incorporate the following measures during the construction phase of the Project to the satisfaction of the SCAQMD and City Public Works Director. Compliance with this measure is subject to periodic field inspections by the SCAQMD and City Public Works Director.**

**Grading:**

- Apply non-toxic soil stabilizers according to manufacturer's specifications to all inactive construction areas (previously graded for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- Enclose, cover, water two times daily or apply non-toxic soil binders in accordance to manufacturer's specifications to exposed piles (i.e., gravel, sand, dirt) with 5% or greater silt content;
- Water active sites at least three times daily;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of the CVC Section 23114.

**Paved Roads:**

- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads; and
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.

315B. As evident in Volume II of the Draft EIR, Section 15.2, *Air Quality Data*, the three air pollutant sources to be generated by the Project (i.e., construction-related, area sources, and long-term mobile vehicular sources), were calculated independently of each other then combined in EIR tables for comparison to SCAQMD thresholds, as appropriate. As such, when the first source was calculated, the other two sources' default values were turned off in the model (i.e., when construction-related emissions were calculated, the area source and long-term mobile vehicle source defaults were turned off, etc.). The commentor is correct in identifying that the architectural coatings default was turned off in the model calculations. In consultation with the air district who initially produced the URBEMIS7G computer model, the EIR preparer was advised to turn off the architectural coatings default since there was an error in the model which would calculate artificially high emission results when the architectural coatings option was enabled. Subsequent consultations with the SCAQMD since production of the URBEMIS7G computer model have supported disabling of the architectural coatings option. The pass-by trip option was also changed in the model since the average daily trips calculated in the traffic report would be project-generated trips and not considered pass-by trips.

315C. Consistent with CEQA Guidelines Section 15097, a Mitigation Monitoring and Reporting Program is included in the Final EIR. This Program would be adopted by the City of Rancho Palos Verdes for the proposed Project. The Program would ensure that the Mitigation Measures and project revisions identified in the EIR are implemented.

**Response to Comment No. 19**

*Jeffrey M. Smith, Senior Planner*

Southern California Association of Governments

March 28, 2001

19A. Refer to the following table which provides an analysis of the Project's consistency with SCAG's Regional Comprehensive Plan and Guide policies.

Page 6-3 of the Draft EIR has been revised in the Final EIR as follows:

Growth-inducing impacts include projects which would remove obstacles to population growth and projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

**The population, housing, and jobs forecasts, which are adopted by SCAG's Regional council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.**

**The City of Rancho Palos Verdes is contained in one of the six counties that comprises the Southern California Association of Governments (SCAG) region. According to SCAG in 1995, the six-county region (Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial Counties) contained a population of 14.6 million persons in 1990. The population projections for the year 2010 for the SCAG region is an estimated 20.5 million persons, representing a population increase of approximately 25 percent (4.2 million persons) between 1998 and 2010. More specifically, the population projections for the year 2000 for the South Bay Cities Subregion is an estimated 857,700 persons and by the year 2010 an estimated 884,600 persons are projected, representing a population increase of approximately 3.1 percent. The growth in population for the region is a result of natural increase and net in-migration.<sup>26</sup>**

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<sup>26</sup> Natural increase: the excess of births over deaths. Net in-migration: the total number of people entering the region minus the people leaving a region.

**PROJECT CONSISTENCY WITH SCAG'S  
REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES**

<b>SCAG RCPG Policies</b>		<b>Consistency Statement</b>
<b>Growth Management Chapter</b>		
3.01	The population, housing, and jobs forecasts, which are adopted by SCAG's Regional council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	Consistent. As discussed in Section 6.3, <i>Growth Inducing Impacts</i> , of this EIR, the proposed Project is consistent with local and regional population, employment and housing projections.
3.03	The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.	Consistent. The proposed Project would require infrastructure and service improvements subject to review by the City and responsible agencies.
<b>1998 Regional Transportation Plan</b>		
4.01	Transportation investments shall be based on SCAG's adopted Regional Performance indicators.	Consistent. Transportation system improvements required with and without the proposed Project are discussed in Section 5.12, <i>Traffic and Circulation</i> , of this EIR.
4.02	Transportation investments shall mitigate environmental impacts to an acceptable level.	Consistent. Mitigation Measures have been developed to reduce the impacts associated with the proposed Project to an acceptable level of service. Refer to Section 5.12, <i>Traffic and Circulation</i> , of this EIR.
4.04	Transportation Control Measures shall be a priority.	Consistent. As appropriate, transportation control measures have been included as traffic and air quality Mitigation Measures. Refer to Section 5.12, <i>Traffic and Circulation</i> , and 5.4, <i>Air Quality</i> , of this EIR.
4.16	Maintaining and operating the existing transportation system will be a priority over expanding capacity.	Consistent. Mitigation Measures have been developed to reduce the impacts associated with the proposed Project to an acceptable level of service. Refer to Section 5.12, <i>Traffic and Circulation</i> , of this EIR.
<b>GMC Policies Related to Improving the Regional Standard of Living</b>		
3.05	Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.	Consistent. Refer to Section 5.12 <i>Traffic and Circulation</i> and Section 5.11, <i>Public Service and Utilities</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.
3.09	Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	Consistent. Refer to Section 5.12 <i>Traffic and Circulation</i> and Section 5.11, <i>Public Service and Utilities</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.
3.10	Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.	Consistent. Refer to Sections 3-25 and 3-34, <i>Project Description</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.

**PROJECT CONSISTENCY WITH SCAG'S  
REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES  
(Continued)**

SCAG RCPG Policies		Consistency Statement
<b>GMC Policies Related to Improving the Regional Quality of Life</b>		
3.12	Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.	Consistent. Refer to Section 5.13, <i>Recreation</i> , for a discussion of the bicycle paths and multi-use trails included as a part of the proposed Project. It should be noted that a RTD Line Terminus (No. 125) exists on Palos Verdes Drive South, immediately adjacent to the RHA. RTD Line 127, a summer only route, travels from this same Terminus. As illustrated in Exhibit 3.7, <i>Circulation Plan</i> , a bus stop would be relocated immediately east of Resort Entry Drive. Refer to Section 10.0, <i>Effects Found Not to Be Significant</i> , for a discussion of alternative transportation.
3.13	Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	Consistent. The proposed Project is an infill redevelopment project. Additionally, a bus stop is proposed on Palos Verdes Drive South adjacent to the Resort Hotel Area.
3.14	Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.	Consistent. Refer to Section 3.0, Project Description, of this EIR. The Project is supportive of this ancillary RCPG policy.
3.16	Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	Consistent. The Project involves redevelopment of the Resort Hotel Area. Refer to Section 3.0, <i>Project Description</i> , of this EIR.
3.18	Encourage planned development in locations least likely to cause environmental impact.	Consistent. The Project is designed in a manner which will minimize adverse environmental impacts. The Mitigation Measures included in this EIR have been developed to address identified adverse considered by the City of Rancho Palos Verdes. The Project is supportive of this ancillary RCPG policy.
3.20	Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.	Consistent. Technical studies have been prepared for the proposed Project addressing these issues. Refer to Sections 5.3, <i>Biological Resources</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.
3.21	Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.	Consistent. Refer to Section 5.4, <i>Cultural Resources</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.



**PROJECT CONSISTENCY WITH SCAG'S  
REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES  
(Continued)**

SCAG RCPG Policies		Consistency Statement
3.22	Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.	Consistent. The proposed Project has been designed to reflect site topographic conditions and seismic hazards. Mitigation Measures addressing this issues are found in Section 5.6, <i>Geology, Soils and Seismicity</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.
3.23	Encourage Mitigation Measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.	Consistent. Mitigation Measures addressing these issues are found in Section 5.9, <i>Noise</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.
<b>GMC Policies Related to Providing Social, Political and Cultural Equity</b>		
3.27	Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.	Consistent. The Project's impacts on these types of services have been fully analyzed in Section 5.11, <i>Public Services and Utilities</i> , of this EIR. Mitigation Measures have been incorporated, as necessary, to reduce the proposed Project's impacts. The Project is supportive of this ancillary RCPG policy.
<b>Air Quality Chapter</b>		
5.07	Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.	Consistent. The proposed Project's consistency with applicable plans are discussed in Section 5.2, <i>Air Quality</i> , of this EIR. The Project is supportive of this RCPG policy.
5.11	Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.	Consistent. The proposed Project's consistency with applicable plans are discussed in Section 5.2, <i>Air Quality</i> , of this EIR. The Project is supportive of this core RCPG policy.
<b>Water Quality Chapter</b>		
11.02	Encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts.	Consistent. A hydrology/drainage assessment was prepared for the proposed Project, which analyzed watershed impacts. Refer to Section 5.6, <i>Hydrology and Drainage</i> , of this EIR.

**PROJECT CONSISTENCY WITH SCAG'S  
REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES  
(Continued)**

<b>SCAG RCPG Policies</b>		<b>Consistency Statement</b>
11.07	Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.	Consistent. The CWSC does not currently have a reclaimed water program available in this area. In the event such a program is made available by CWSC prior to construction, the Project Applicant has stated their intent to provide a reclaimed water distribution system for golf course landscape irrigation. The system would be reviewed and approved by CWSC. Refer to Section 5.11-6, <i>Public Services and Utilities</i> , of this EIR. The Project is supportive of this ancillary RCPG policy.
<b>Open Space Chapter Ancillary Goals</b>		
9.01	Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.	Consistent. Refer to Section 3.0, <i>Project Description</i> , and 5.7, <i>Land Use and Relevant Planning</i> , of this EIR. The Project is supportive of this ancillary RCPG goal.
9.02	Increase the accessibility to open space lands for outdoor recreation.	Consistent. Refer to Section 3.0, <i>Project Description</i> , and 5.7, <i>Land Use and Relevant Planning</i> , of this EIR. The Project is supportive of this ancillary RCPG goal.
9.03	Promote self-sustaining regional recreation resources and facilities.	Consistent. Refer to Section 3.0, <i>Project Description</i> , and 5.7, <i>Land Use and Relevant Planning</i> , of this EIR. The Project is supportive of this ancillary RCPG goal.

SCAG = Southern California Association of Governments

RCPG = Regional Comprehensive Plan and Guide

The proposed Project does not involve the development of housing which would result in a direct growth in the City's permanent population. However, the employment created by the proposed uses has the potential to result in an indirect growth in the City's population since the potential exists that "future employees" (and their families) may choose to relocate to the City. It is anticipated that the proposed improvements would result in an approximate net employment increase of 700 full-time equivalent employees (FTEE).<sup>27</sup> It is further anticipated that the majority of the employment created would involve service occupations.

~~Based on the California Department of Finance criteria of 2.927 persons per household<sup>28</sup>, an increase of 700 employees and their families has the potential to represent a total of 2,050 persons. In the unlikely event that all 2,050 persons would relocate to the City of Rancho Palos Verdes, the influx would result in an approximate 5 percent increase over the City's current population estimate of 44,950 persons.<sup>29</sup>~~

The potential increase in population is not anticipated to result in a significant growth inducing impact for the following two reasons:

Page 6-4 of the Draft EIR has been revised in the Final EIR as follows:

Based on these factors, Project implementation has been concluded to not induce substantial growth in the City's permanent population, thus, a significant impact is not anticipated in this regard.

**SCAG has estimated the population of Rancho Palos Verdes for the year 2000 at approximately 13,700 persons. By the year 2010, it is projected that the total population would be 13,800 persons, representing a population increase of approximately 100 persons or 0.73 percent. As discussed above, the proposed Project is not anticipated to cause a population increase in the City of Rancho Palos Verdes. Consequently, the proposed Project is consistent with the Growth Management Chapter of the Southern California Association of Government's (SCAG) Regional Comprehensive Plan and Guide.**

<sup>27</sup> Telecon: Michael Mohler, Destination Development Corporation, July 10, 2000.

<sup>28</sup> ~~California Department of Finance, Table 2, City/County Population and Housing Estimates, January 1, 2000~~

<sup>29</sup> ~~U.S. Department of Finance, Report E-1, 2000.~~

Based on the California Department of Finance criteria of 2.927 persons per household<sup>30</sup>, an increase of 700 employees and their families has the potential to represent a total of 2,050 persons. In the unlikely event that all 2,050 persons would relocate to the City of Rancho Palos Verdes, the influx would result in an approximate 5 percent increase over the City's current population estimate of 44,950 persons. However, based on the factors discussed above, Project implementation has been concluded to not induce substantial growth in the City's permanent population, thus, a significant impact is not anticipated in this regard.

### **Response to Comment No. 20**

*Dwight E. Sanders, Chief*

State of California, California State Lands Commission

March 21, 2001

20A. Page 5.6-25 of the Draft EIR has been revised in the Final EIR as follows:

. . . Mitigation has been specified requiring that the City make this determination.

Concern has been raised regarding potential impacts to tidelands and beds of navigable waterways associated with the proposed outfall structures. However, as previously noted, the elevations, design, and types of the outfall structures would be determined during the design phase of the Project. Potential impacts to tidelands and beds of navigable waterways would be reduced to less than significant levels with implementation of mitigation requiring that the Applicant consult with the California State Land Commission.

Page 5.6-37 of the Draft EIR has been revised in the Final EIR as follows:

5.6-1a The City may. . .

5.6-1b In the event the outfall structures are located within the jurisdiction of the California State Lands Commission, the Project Applicant shall consult with this Agency prior to Grading Permit issuance for the Project, with respect to outfall elevations and avoidance of impacts to tidelands and beds of navigable waterways.

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<sup>30</sup> California Department of Finance, Table 2, *City/County Population and Housing Estimates*, January 1, 2000

**Response to Comment No. 21**

*Terry Roberts, Senior Planner*

State of California, Governor's Office of Planning and Research, State Clearinghouse  
March 23, 2001

- 21A. This letter from the State Clearinghouse transmits the comment letter received from the responding agencies. Only one letter was transmitted: from the California State Lands Commission (March 21, 2001). This letter is included as Comment Letter No. 20.

**Response to Comment No. 22**

*Jeff McCusker, Outdoor Recreation Planner*

U.S. Department of the Interior, National Park Service  
August 28, 2000

- 22A. The Federal Endangered Species Act (FESA) requires federal agencies to consult with each other regarding any federal action that may affect a federally-listed species to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to "jeopardize the continued existence of" listed species or destroy or adversely modify designated critical habitat. If the National Park Service would be involved with the transfer of federal lands for the proposed Project, a Section 7 consultation with the USFWS would be required pursuant to the FESA. The Section 7 consultation process will evaluate the Project's potential to "jeopardize the continued existence of" the coastal California gnatcatcher. At the conclusion of the federal agency consultation process, the USFWS will issue a Biological Opinion that states whether a project will or will not jeopardize the continued existence of the species and may issue an incidental take statement.

As stated on Page 5.3-49, of the Draft EIR, the coastal California gnatcatcher is known to occur in the coastal sage scrub on the UPVA. Four pairs of gnatcatchers were observed on the UPVA during surveys in 1998 and may be impacted by construction of the proposed Project by both direct (habitat removal) and indirect (disturbance) effects. These impacts are considered significant. The Long Point Habitat and Conservation Program (LPHCP) has been developed and would be implemented to reduce these impacts to a level of less than significant.

As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant pallet will only include locally appropriate native species. In regards to wildlife movement, the steep cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site will be maintained as permanent open space and would not be impacted. The project design of the UPVA area has maintained a connection to the open space areas off-site. In addition, the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation as discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

The proposed habitat preservation and restoration outlined above and illustrated on 5.3-4 increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites*. Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site will be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal

sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

22B. Refer to Response to Comment No. 18D.

**Comment No. 313**

*John J. Reynolds, Regional Director, Pacific West Region*

U.S. Department of the Interior, National Park Service

April 9, 2001

313A. The City recognizes that the conceptual plan developed in 1979 was not an approved plan. However, both the City and the NPS had been operating under the assumption that the 1979 Plan was the "implementing plan". Further, the City requested from the NPS a copy of the approved Program of Utilization. In return, the City received a packet of documentation from the NPS which included the 1979 Plan. As a result, the Draft EIR and the impact analysis contained therein was based upon the 1979 Plan. It should be noted, however, that regardless of whether the proposed Project is analyzed in terms of it's consistency with the 1976 Plan or the 1979 Plan, the Project would be considered inconsistent with the POU since a golf course was not an identified recreational use in the POU. Further, the Deed established the requirement that the property be used and maintained for the public purposes for which it was conveyed as set forth in the POU. This inconsistency would be considered a significant impact unless mitigated. Accordingly, mitigation has been specified that requires obtaining written concurrence from the Secretary of the Interior authorizing amendments to the POU.

313B. Each point symbol on Exhibit 5.3-1 of the Draft EIR, *Biological Resources Within Resort Hotel Area*, and Exhibit 5.3-2 of the Draft EIR, *Biological Resources Within Upper Point Vicente Area*, indicates the locations the species were sited.

313C. As detailed in Section 5.7, *Recreation*, the Project's proposed recreational facilities include both active and passive recreational uses, some of which are established in the POU for the UPVA. Based on the POU detailed in Table 5.7-1, *Program of Utilization*, and illustrated Exhibit 5.7-4, *Program of Utilization Conceptual Plan*, the recreational uses proposed by the Project which are considered generally consistent with the POU include the following:

- Hiking/Jogging Trails. The Project proposes the development of pedestrian trails in the UPVA;

- Lookout Points. The Project proposes five scenic view points in the RHA;
- Picnic Areas & Open Play Areas. The Project proposes these recreational uses at two locations the City Hall Park Expansion (Planning Area 2-F) and the Point Vicente Overlook (Planning Area 2-G); and
- Natural Areas. The Project proposes approximately 24.9-acres to be conserved, enhanced and created as Coastal Sage Scrub habitat (Upper Point Vicente Area Coastal Sage Scrub Habitat (PA 1-B)) in the UPVA.

All of these proposed recreational facilities would be designated for public use. This would be consistent with the Deed requirement that the UPVA be maintained for public purposes. In addition, the proposed golf course and practice facility would be public and available for use by the resort hotel guests, residents and visitors.

The Project proposes that approximately one-half of the UPVA be developed with a golf course. This would be considered inconsistent with the POU since a golf course was not an identified recreational use in the POU. Further, the Deed established the requirement that the property be used and maintained for the public purposes for which it was conveyed as set forth in the POU. This inconsistency would be considered a significant impact unless mitigated. However, as the Deed further authorized amendments to the POU provided written concurrence is first obtained from the Secretary of the Interior, mitigation that requires obtaining this approval be obtained prior to Project implementation would reduce impacts to less than significant levels.

### **Response to Comment No. 23**

*R.M. Diehl, Commander*

U.S. Department of Transportation, U.S. Coast Guard

April 6, 2001

23A. Page 3-10 of the Draft EIR has been revised in the Final EIR as follows:

Additionally, the federal government transferred the Point Vicente Bunker site (i.e., Battery 240) in it's entirety to the U.S. Coast Guard (approximately 3.9 acres). together with a 3.9-acre parcel and a 40-foot wide, 0.52-acre utility easement. This approximately 3.9-acre property is presently owned by the U.S. Coast Guard and is used as the location of an antenna for antennas and for storage of communication equipment.

Page 5.4-10 of the Draft EIR has been revised in the Final EIR as follows:



The sole survivor in that group was the mess hall, which was rehabilitated for the Nike site in 1954 (*ibid.*), but is no longer in existence today (see discussion of Site 19-180591, below). **The entire battery was transferred to the U.S. Coast Guard by General Services Administration (GSA) in 1978.**

At present, the gun battery itself remains present at the site, which consists of two concrete gun blocks and a subsurface concrete and steel structure housing the power rooms, shell rooms, and other supporting facilities. Although the gun blocks now stand vacant and one of them is overgrown by vegetation, the battery is overall in a very good state of preservation ~~and is reportedly still used by the U.S. Coast Guard for some purposes.~~ **Additionally, the battery is presently utilized by the U.S. Coast Guard and two of their tenants as a part of their communications network.** Much of the site is located on the Coast Guard parcel and thus outside the Project area, including both gun blocks, but roughly half of the battery's subsurface structure, including the main entrance, is situated within the Project boundaries.

Section 7.3 of the Draft EIR, *With Coast Guard Site Alternative*, acknowledges that the development of Federal lands would entail additional Federal resource regulations, compliance with the National Environmental Protection Act (NEPA), and possible negotiations for acquisition of the 3.9-acre property.

- 23B. Pursuant to Section 15126.6 of CEQA Guidelines, an EIR must consider a reasonable range of potentially feasible alternatives. This Alternative was selected in that it would be capable of avoiding and or lessening the proposed Project's biological impacts. Nonetheless, as previously noted, it is acknowledged that the implementation of this Alternative would entail additional consultation with Federal agencies.

Further, it is noted that this commentor's letter has indicated that Alternative 7.3, *With Coast Guard Site Alternative*, is no longer feasible, as required by CEQA Guidelines.

Additional comments are noted and will be considered by the City of Rancho Palos Verdes.

- 23C. The Coast Guard has cited that they have complete jurisdiction over the status of "Bunker 240". Accordingly, Page 5.4-19 of the Draft EIR has been revised in the Final EIR as follows:

The recommended mitigation ~~identifies two separate options that may~~ **would** reduce impacts to a less than significant level.

Page 5.4-24, Mitigation Measure 5.4-1c, of the Draft EIR has been revised in the Final EIR as follows:

5.4-1c Site 19-180590 (Battery 240). Due to the proposed Project's potential to cause a change in the significance of this historical resource, ~~one of the following mitigation options shall be implemented~~ prior to ~~Demolition~~ **Grading** Permit issuance: , • ~~Option 1 (preferred)~~. Project effects to this site shall be avoided by preserving the portion of the site within the Project area and incorporating it into the Project design in such a way as to retain the historic characteristics of this resource.

- ~~Option 2 (if demolition is unavoidable). The historical and physical information about Battery 240 is to be preserved through comprehensive documentation at a level compatible to Level 2 of the Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER).~~

~~Established in 1933 and 1967, respectively, HABS and HAER have been adopted by the National Park Service as the primary methods of preserving important information about architectural, engineering, and industrial sites of historic value, and are often initiated as the means of mitigating adverse effects of federal undertakings on such sites (NPS 1993:1). At Level 2, HABS/HAER requires detailed textual and photographic recordation, sketch maps and drawings of structural features, and historical documentation to record the subject property's history. The results of such documentation are to be made accessible to the public at one or more local repositories, such as the local history collection of the Palos Verdes Library and/or the Palos Verdes Historical Society's museum.~~

Additionally, refer to Response to Comment No. 23A.

23D. Page 5.7-2 of the Draft EIR has been revised in the Final EIR as follows:

A 3.9-acre U.S. Coast Guard site ~~that~~ forms an island within this area, west of the City Hall, however, is not a part of the Project.

Overall, this area has been extensively graded for military and agricultural uses. . . . A fire access road traverses through this area extending from the City Hall to the U.S. Coast Guard site. Existing uses on the U.S. Coast Guard site include a World War II-era bunker (i.e., **Battery 240**) situated at the terminus of the fire access road and **utilized the U.S. Coast Guard and two of their tenants as part of their communications network, and governmental/commercial uses related to an onsite antenna antennas.**

Page 5.11-20 of the Draft EIR has been revised in the Final EIR as follows:

*5.11-8 Project implementation may result in an increase in the demand for electrical service beyond existing conditions and may require expansion of the existing electrical system. Analysis has concluded that impacts would be less than significant. Mitigation has been specified to reduce impacts to the U.S. Coast Guard site and associated electrical easement to less than significant levels.*

Page 5.11-21 of the Draft EIR has been revised in the Final EIR as follows:

The Code requires that “all utility lines installed to serve new construction be placed underground from an existing power pole or other point of connection off-site.”

As previously noted, a 40-foot wide U.S. Coast Guard electrical easement exists on the UPVA. The U.S. Coast Guard has noted their approval to either underground or relocate this electrical utility line, provided service is not interrupted. Potential impacts are considered as less than significant with mitigation requiring that the Project Applicant consult with the U.S. Coast Guard with respect to their electrical easement. Additionally, it should be noted that the U.S. Coast Guard has expressed their continued need for utility vehicle access by the themselves and their tenants to their property. Therefore, removal of the existing fire access road (which extends between the City Hall and the U.S. Coast Guard site) would be considered significant unless mitigated. Potential impacts would be reduced to less than significant levels with implementation of mitigation requiring that the Project Applicant consult with the U.S. Coast Guard with respect to the provision of a vehicle access road.

Page 5.11-24 of the Draft EIR has been revised in the Final EIR as follows:

~~5.11-8 No Mitigation Measures are required.~~ Prior to Grading Permit issuance, the Project Applicant shall consult with the U.S. Coast Guard regarding the 40-foot wide electrical easement which exists on the UPVA. The Applicant shall either underground or relocate this electrical utility line; however, electrical service to the Coast Guard shall not be interrupted. Additionally, the Project Applicant shall consult with the U.S. Coast Guard regarding the provision of a vehicle access road to the U.S. Coast Guard site.

- 23E. Exhibit 3-4 of the Draft EIR, *Property Ownership Map*, has been revised in the Final EIR to reflect the 40-foot wide, 0.52-acre utility easement (refer to Volume I, *Final EIR*).

Page 5.11-9 of the Draft EIR has been revised in the Final EIR as follows:

Existing overhead and underground electrical lines are located on the Project site and along Palos Verdes Drive South.

**Additionally, as noted in Section 3.0, *Project Description*, a 40-foot wide, 0.52-acre utility easement exists on the UPVA, extending from the U.S. Coast Guard site to Palos Verdes Drive South. This electrical easement provides service to the U.S. Coast Guard Point Vicente Light Station located west of the UPVA.**

Additionally, refer to Response to Comment No. 23D.

- 23F. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 24**

*Jim A. Bartel, Assistant Field Supervisor*

*William E. Tippetts, Environmental Program Manager*

U.S. Fish and Wildlife Service

Carlsbad Fish and Wildlife Office

March 1, 2001

- 24A. This comment does not pertain to the Long Point Resort Project. Comment is noted.
- 24B. **As stated on Page 5.3-49, of the Draft EIR, the coastal California gnatcatcher is known to occur in the coastal sage scrub on the UPVA. Four pairs of gnatcatchers were observed on the UPVA during surveys in 1998 and may be impacted by construction of the proposed Project by both direct (habitat removal) and indirect (disturbance) effects. These impacts are considered significant. The Long Point Habitat and Conservation Program (LPHCP) has been developed and would be implemented to reduce these impacts to a level of less than significant.**
- 24C. This comment does not pertain to the Long Point Resort Project. Comment is noted.
- 24D. The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation as discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation

Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

The proposed habitat preservation and restoration outlined above and illustrated on 5.3-4 increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites*. Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site will be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... “the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added).”

Because the City’s NCCP is not adopted, there can not be any identified impact to the NCCP because it is not “adopted.” However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.

As discussed in the Draft EIR, the design of the City’s NCCP reserve is currently under development.<sup>31</sup> With guidance and input from the major landowner, local government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered “equal” by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City’s preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.

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<sup>31</sup> Personal Communication: D. Snow and A. Johnston, September 2000.

- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

- 24E. This comment does not pertain to the Long Point Resort Project. Comment is noted.
- 24F. This comment does not pertain to the Long Point Resort Project. Comment is noted.
- 24G. This comment does not pertain to the Long Point Resort Project. Comment is noted.

**Response to Comment No. 25**

*William Tippets, Environmental Program Manager*

*Karen Evans, Acting Assistant Field Supervisor*

U.S. Fish and Wildlife Service

Carlsbad Fish and Wildlife Office

April 5, 2001

25A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

25B. The Significance Criteria established for this Project, as consistent with Appendix G of the CEQA guidelines, state that a project may create a significant environmental impact if .... "the project conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (emphasis added)."

Because the City's NCCP is not adopted, there can not be any identified impact to the NCCP because it is not "adopted." However, when considering the biological value of the resources within the City and the region, the ongoing efforts to develop the NCCP were considered, including the current proposed reserve design alternatives. The NCCP plan is intended to provide comprehensive management and conservation of multiple species while allowing for compatible and appropriate development and growth. Viable reserve designs can include several variations, not all of which require the preservation of all native resources within the subregion for each of the alternatives to be considered viable.

As discussed in the Draft EIR, the design of the City's NCCP reserve is currently under development.<sup>32</sup> With guidance and input from the major landowner, local government, state and federal agency, and environmental organization representatives, the City completed Phase I of the Palos Verdes peninsula NCCP in 1999. The primary focus of the Phase I effort was to map existing vegetation communities, along with sensitive species distributions and their potential habitat, and to then use this information to develop preliminary alternative reserve designs. Three alternative reserve designs are currently being considered by the City. At this time, all three alternatives are considered "equal" by the City; however, the City Council has authorized City staff to proceed with a biological and economic analysis of the three draft alternatives in order to identify the City's preferred alternative reserve design. The results of the analysis are expected to be presented to the City Council sometime in the summer of 2001.

The three current reserve designs were developed with the following goals taken into consideration:

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<sup>32</sup> Personal Communication: D. Snow and A. Johnston, September 2000.



- Meet NCCP standards and issuance criteria for Endangered Species Act Section 10(a) take authorizations for target species proposed to be covered by the citywide permit.
- Conserve the most practicable amount of Regionally Important Habitat Areas.
- Provide habitat linkages between patches of conserved habitat.
- Enhance/restore the most practicable amount of disturbed habitats directly adjacent to conserved habitat to enhance patch size and habitat linkage function (i.e., areas with moderate to high potential for successful restoration).
- Provide for future economic use of private properties that support regionally important resources, where feasible.

In designing the reserve areas, consideration was given to:

- Minimize edge effects to conserved habitat adjacent to existing and future development, where practicable.
- Provide for adequate habitat linkages between conserved habitats where possible.
- Identify areas where development compatible with preserve function can be feasibly placed.
- Generally consider overall cost of land acquisition (if any), habitat restoration, and habitat management.

At this point in the NCCP reserve design process, the proposed Project is consistent with two of the three reserve designs (Alternative B and C). Because the additional economic and biological resource analysis (Phase II) has not been completed to date for these three alternatives, some assumptions have to be made in regards to the proposed Project's consistency or conflict with the preliminary reserve designs. Based on the information to date, two alternatives have been identified for the City of Rancho Palos Verdes NCCP that do not include reserve areas within the boundaries of the permanent impact areas of the proposed Project. Therefore, it can be stated that the proposed Project could not be in conflict with the overall reserve design goals and objectives because the preliminary analysis has shown that viable reserve designs exist with the inclusion of the proposed Project.

25C. These comments do not raise a new environmental issue.

Focused surveys on the Project site have been conducted to assess the UPVA and RHA for potential habitat for the federally Endangered Palos Verdes blue (PVB, *Glaucopsyche lygdamus palosverdesensis*), and to determine presence or absence of PVB on the site. This species was not observed during focused survey efforts conducted during the Spring of 2001 by BonTerra Consulting. Therefore, Project implementation would not result in any impacts on this species.

Pages 5.3-2, 5.3-25, 5.3-26 and 5.3-48 of the Draft EIR have been revised to reflect the focused surveys for the Palos Verdes Blue and the Endangered El Segundo blue butterfly (refer to Volume IV, *Revised Biological Resources Section*).

Page 5.3-65 of the Draft EIR, Mitigation Measure 5.3-1c, has been revised to reflect the El Segundo blue butterfly (refer to Volume IV, *Revised Biological Resources Section*).

- 25D. As defined in the document, wildlife corridors must “connect” habitat patches. The Draft EIR acknowledges the UPVA’s connection to the habitats to the east and the RHA’s to the east and west. However, direct connection on the UPVA to open space areas north and west are obstructed by Hawthorne Boulevard, Palos Verdes Drive West, and residential and commercial development. As a result, less mobile wildlife species would be limited in their ability to reach the open space areas to the north and west. More mobile species, such as birds, are less affected by these obstructions and are expected to be able to reach the open space areas north and west of the site that provide suitable habitat for these species.

Regarding wildlife crossings, please note that based on literature<sup>33</sup>, crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. Wildlife crossings are not present across Hawthorne Boulevard to the north of the UPVA or across Palos Verdes Drive to the west and south.

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<sup>33</sup>The definitions of wildlife movement terminology were generated from the following sources:

Bennett, A.F. *Habitat corridors and the conservation of small mammals in the fragmented forest environment*. *Landscape Ecol.* 4:109-122. 1990.

Farhig, L., and G. Merriam. 1985. Habitat patch connectivity and population survival. *Ecology* 66:1,792-1,768.

Harris, L. D., and P.B. Gallagher. 1989. *New Initiatives for Wildlife Conservation; The Need for Movement Corridors*. Pages 11-34 in G. Mackintosh, ed. *Preserving Communities and Corridors*. Defenders of Wildlife., Washington, D.C. 96pp.

MacArthur, R.H., and E.O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton University Press. Princeton, New Jersey.

Noss, R. F. 1983. *A Regional Landscape Approach to Maintain Diversity*. *BioScience* 33:700-706.

Simberloff, D., and J. Cox. 1987. *Consequences and Costs of Conservation Corridors*. *Conser. Biol.* 1:63-71.

Soule, M. E. *Viable Populations for Conservation*. Cambridge Univ. Press, New York, N.Y. 1987.

Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section. CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites.* Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site will be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

Mitigation to address potential indirect impacts, including edge effects, to native habitat types and special status plant and wildlife species by the proposed golf course uses are identified in Mitigation Measures 5.3-2a, 5.3-2c through e, and 5.3-2g. Implementation of these measures would reduce the potential disturbance of the golf course activities to less than significant.

Pages 5.3-45 and -46 of the Draft EIR state the following in regards to impacts to “threatened plant and animal species”: Section 15065(a), *Mandatory Findings of Significance*, of the CEQA Guidelines states that a project may have a significant effect on the environment if “...the project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species...” (underlining added). Impacts to state or federally listed species or those species that meet the criteria as defined by CEQA were identified as significant in the Draft EIR. Mitigation to reduce the impacts to a less than significant level was also provided.

Other common (not listed as threatened or Endangered) plant and wildlife species that may be impacted by the proposed Project do not pass the significance criteria established by the City for this project under the CEQA because populations of common plant and wildlife species would not be significantly reduced in the region.

It has been documented<sup>34</sup> that restored sage scrub and other habitat types, when done in a biologically sound manner and under supervision of a qualified biologist with experience in native plant restoration, can and will support a wide variety of native plant and animal species including those listed as threatened or endangered by the state and federal regulatory agencies. The creation of habitat is an approved form of mitigation by the regulatory agencies and is often a component of compensation/mitigation plans that are processed with these agencies.

Because of the mitigation of the proposed plan, including preservation, restoration, and protection of retained native habitats, it is expected that the proposed Project site will continue to support the gnatcatcher both for breeding and dispersal activity.

The Draft EIR identified impacts to the coastal California gnatcatcher and its habitat (scrub communities) as significant on Page 5.3-49 and Page 5.3-53. Adverse effects of fragmentation are discussed on Page 5.3-58. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, 4.44 acres of coastal bluff scrub habitat, and 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio of over 7 to 1, is far above typical mitigation standards of 2 to 1 and 3 to 1.

The project applicant has agreed to modify the development plan to avoid any impacts to the coastal bluff scrub areas.

The proposed habitat preservation and restoration outlined above and illustrated on Page 5.3-4 of the Draft EIR increases the size of the sage scrub patches currently present on the UPVA. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the

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<sup>34</sup> November 21, 2001. Year-end Report for the Ocean Trails HCP Area California Gnatcatcher Study, City of Rancho Palos Verdes, Los Angeles County, California - Permit # PRT-800922.

vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

Mitigation Measure 5.3-1d identifies that the project applicant shall comply with the Federal Endangered Species Act (FESA) with regards to any impacts to the coastal California gnatcatcher, which is known to occur in the sage scrub habitat onsite. The commitment of the project applicant will be ensured by the U.S. Fish and Wildlife Service's (USFWS) enforcement of this act and the permit conditions that would apply to the proposed Project. Any permit to remove habitat and or impact a federally listed threatened or endangered species requires monitoring of the proposed action and reporting requirements for any proposed habitat restoration program. If the project applicant does not meet the success criteria established for the restoration program, the USFWS may require additional mitigation.

As discussed in Mitigation Measure 5.3-2i, the revegetation program is proposed in accordance with the plant palette developed for the LPHCP. This plant palette will only include locally appropriate native species. The steep cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site will be maintained as permanent open space and would not be impacted. The Project design of the UPVA area has maintained a connection to the open space areas off-site. In addition, the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

Although there is no set rule with regards to the required mitigation ratio that at the U.S. Fish and Wildlife Service requires during the processing of a 4(d) Interim Habitat Loss Plan, 10(a) permit, or through a Section 7 consultation pursuant to the federal Endangered Species Act, there are industry standards and precedent. A mitigation ratio of 3.4 to 1 is greater than the commonly accepted ratio of 1 to 1 or 2 to 1.

25E. Refer to Response to Comment Nos. 25B and 25D.

25F. Section 7.0 of the Draft EIR, provides an analysis of potential environmental impacts associated with nine separate alternatives as compared to impacts from the proposed Project. These alternatives were selected based upon their ability to avoid or substantially lessen the significant effects of the proposed Project, particularly with respect to aesthetic, biological, and land use impacts. Of the nine alternatives, the following do not propose a golf course on the UPVA:

- No Development Alternative;
- No Project Alternative;
- Program of Utilization Alternative;
- Point Vicente Park Enhancement Alternative; and
- Point Vicente Park Enhancement and Existing Entitlement Alternative (refer to new Alternative 7.10 in FEIR).

25G. Refer to Response to Comment No. 25D.

25H. Refer to Response to Comment No. 25F.

Of the nine alternatives analyzed, the following would involve development of the practice facility at a location other than the UPVA:

- Relocate Practice Facility - Option A Alternative;
- Relocate Practice Facility - Option B Alternative; and
- No Resort Villas - Option B Alternative.

As noted in this comment, the Project Applicant intends to modify their applications to reflect as the preferred project a *refined* Alternative 7.5. It should be noted that the Alternative identified by the Applicant as their preferred Alternative was analyzed in Draft EIR Section 7.5, *Relocate Practice Facility - Option "B" Alternative*. The Applicant has agreed to modify Alternative 7.5 in response to comments regarding prior promises made to St. Paul's Lutheran Church and/or the Villa Capri residents. Additionally, Alternative 7.5 was modified in an effort to reduce biological impacts and golf safety impacts in the Upper Point Vicente Area.

25I. Conservation easements are typically granted to the appropriate resource agency (either CDFG or USFWS) in perpetuity and are irrevocable. Since the majority of the habitat preservation areas lie on the UPVA, the City would have to consent to the grant of such a conservation easement on UPVA since it would permanently restrict the uses of the park. Additionally, the City and the Developer would need to enter into a separate agreement to ensure that the Developer assumes the costs associated with the maintenance of the habitat conservation areas. Such an agreement would probably take the form of a Development Agreement which would be recorded and would set forth, among other things, (i) the duties and obligations of the City and the Developer with respect to the establishment of the conservation easement; (ii) the terms and restrictions of the Developer's use of the habitat conservation areas, and (iii) the duties and obligations of City and Developer with respect to the long term maintenance of the conservation easement.

25J. Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 25K. Page 5.3-65 of the Draft EIR, Mitigation Measure 5.3-1b, has been revised to provide additional detail for the special status plant mitigation program (refer to Volume IV, *Revised Biological Resources Section*).

The general guidelines developed for the *Dudleya* mitigation are based on past professional experience and consultation with professional botanists and regulatory agency personnel. The establishment of special status plants directly on the mitigation site has been proven to be an effective and advisable program for some species. Depending on the number of individuals observed, the species ultimately collected on site for all special status plants, and current plant establishment techniques, other methods may be developed during the preparation of the Special Status Plant Mitigation Plan that best addresses the successful establishment of the species on the site.

- 25L. Refer to Response to Comment No. 25C.

- 25M. As noted in Section 5.5, *Geology and Soils*, the potential for the accumulation of groundwater beneath the Project area due to infiltration of landscape irrigation, storm water runoff, etc. appears to be unlikely given the pervasive fracturing of the bedrock beneath the area. However, the addition of storm water runoff, landscape irrigation for the golf course and resort areas, etc., could result in the localized building up of groundwater beneath the Project area. With the buildup of groundwater comes the increased potential of localized failures on the bluffs and/or reactivation of existing landslides due to the buildup of pore pressure in the rock and soil, and the possibility of groundwater acting to lubricate weak rock and soil layers. This impact would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation requiring groundwater monitoring wells and periodic visual reconnaissance.

Additionally, it should be noted that the RHA has a greater potential for a landslide than the UPVA, although, it has a lesser habitat value than the UPVA. Conversely, the UPVA has a lesser potential for a landslide than the RHA, although it has a greater habitat value than the RHA.

- 25N. Page 5.3-66 of the Draft EIR, Mitigation Measure 5.3-1e, has been revised to address potential direct and indirect (noise) impacts on raptor species (refer to Volume IV, *Revised Biological Resources Section*).

In addition, Mitigation Measure 5.3-2a includes the implementation of the LPHCP which provides for a landscaping buffer to be planted along the boundary of the development edge. Potential lighting impacts are addressed in Mitigation Measure 5.3-2k.

Impacts on special status bat species were found to be less than significant, and no mitigation would be required.

- 25O. The impact area for the RHA provided to BonTerra Consulting for analysis and display included a small portion of coastal bluff scrub when the impact area was integrated into the GIS program and compared with the vegetation maps of the site. However, the project applicant has said that they would not impact any coastal bluff scrub, regardless of what may be indicated on the map. Because the mapping exercise indicated that a small area would be impacted, mitigation to avoid these areas was specified.
- 25P. Impacts to annual grassland, coastal cactus wrens, and foraging habitat for raptors do not meet the thresholds of significance identified for this project on Page 5.3-45 according to the CEQA Guidelines. Impacts must consider the project in context with the availability of this habitat type within the region and the distribution of these species throughout their ranges. Therefore no mitigation is warranted according to CEQA. Impacts to the gnatcatcher were found to be significant and mitigated accordingly.
- 25Q. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 25R. Based on Applicant's consultation with the Los Angeles County Fire Department, their fuel modification requirements include a 40 to 50 foot zone, planted, irrigated, or disced frequently as is the current practice.<sup>35</sup> These Fire Department requirements would be implemented into the Project design without any affect to the Project's proposed habitat conservation areas.
- 25S. At the request of the USFWS, the Project Applicant and City will meet with the USFWS prior to final certification action.

**Response to Comment No. 26**

*Dr. Molly Rhodes, Research Analyst*

Union Local 30, Hotel Employees and Restaurant Employees Union

April 5, 2001

- 26A. As noted in Section 5.12, *Traffic and Circulation*, trip distribution represents the directional orientation of traffic to and from the Project site. Trip distribution is heavily influenced by the geographical location of the site, the location of residential, commercial and recreational opportunities and the proximity to the regional freeway system. The directional orientation of traffic was determined by evaluating existing land uses and highways within the community and existing traffic volumes. It should also be noted that the resort hotel would provide directional assistance within promotional material that would affect patrons driving patterns for visiting the Project site.

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<sup>35</sup> E-Mail: Mike Mohler, Lowe Enterprises, June 5, 2001.



Trip generation represents the amount of traffic which is produced or attracted to a development. The traffic generation for this Project has been estimated, based upon the specific land uses which have been planned for the proposed development. The trip generation rates within the traffic study are based upon the latest data collected by the Institute of Transportation Engineers (ITE) and San Diego Association of Governments (SANDAG). The rates inherently include all of the trips related to each specific land use (including but not limited to patrons and employees). Therefore, employee traffic generation was included within the total traffic projected to be generated by the proposed Project.

The trip generation rates within the traffic study are based upon the latest data collected by the Institute of Transportation Engineers (ITE) and San Diego Association of Governments (SANDAG). The Project trip generation within the traffic study has not reduced the hotel/meeting facility portion of resort hotel to account for internal hotel use.

The traffic reducing potential of public transit has not been considered in the traffic study. Essentially, the traffic projections are “conservative” in that public transit might be able to reduce the traffic volumes.

- 26B. The Hotel del Coronado is a unique hotel and its staffing needs should not be compared to the proposed Long Point Resort, regardless of the same operating company. The Project Applicant has determined that the number of proposed employees (including their work schedules) is adequate to serve all of the proposed uses on site.
- 26C. As stated in Response to Comment No. 26B, a comparison of the proposed Project staffing requirements with the Hotel Del Coronado is not appropriate. In addition, the Draft EIR demonstrates in Section 5.12, *Traffic and Circulation*, that the proposed parking supply is adequate to serve both resort patrons and employees on site. The parking rates are based on industry standards that include a range of hotels and employee per room ratios.
- 26D. The traffic study Project trip generation is not based on employees. The trip generation for the hotel/meeting facility, casitas units and resort villas are based on rooms. The trip generation for the retail facilities, restaurants and health spa/fitness center are based on thousand square feet. The golf course is based on the number of holes provided and the driving range is based on acreage. Trip generation is based upon the latest data collected by the Institute of Transportation Engineers (ITE).

- 26E. The resort hotel land use trip generation is based upon the latest data collected by the Institute of Transportation Engineers (ITE). The ITE rates are based upon the AM and PM peak hours during a typical weekday and intrinsically account for the various shift changes.
- 26F. Refer to Response to Comment No. 26A.
- 26G. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 26H. The trip generation and parking estimates provided in Section 5.12, *Traffic and Circulation*, inherently include employees on site. The use of an industry accepted standard (i.e., ITE) complies with CEQA. As demonstrated, the number of employees on site, estimated by the Project Applicant, would not significantly impact the surrounding circulation system as defined by CEQA, nor would the number of employees impact the parking demand on site. The proposed parking supply has accounted for both the hotel patrons and employees. Therefore, an adequate amount of parking would be provided on site for both hotel patrons and employees, regardless of location. In addition, all estimates of employee trip generation and parking demand do not include the public parking areas on site, nor the use of carpooling, shuttle service or transit.
- 26I. As noted in Section 5.12, *Traffic and Circulation*, an estimated 40% to 50% of the employees would be transit dependent. This range does not effect the overall parking demand, as the rate of 1.5 spaces per room inherently includes employee parking. Therefore, the transit employees would provide a surplus of parking since they would not drive to work. Therefore, the parking supply for the proposed Project is adequate to serve the hotel patrons and employees on site, even without the public parking areas. The Project management company would determine the specific locations of employee parking within the proposed parking supply, which is forecast to be adequate to accommodate the future parking demand.
- 26J. The parking for both guests and employees are on site, and accessible to all of the uses on-site. The parking design and layout of the Project site includes pedestrian circulation to minimize conflicts with vehicles. Shuttles for guests and employees on site are not necessary as the parking areas are sufficiently close to the uses.
- 26K. A regular business day assumes typical operations of the hotel, conference, golf course, spa and other amenities on site. These are the conditions analyzed in the Draft EIR, as defined by CEQA. Based on the traffic and parking analysis, there are no significant adverse impacts. The special circumstances identified in the Draft EIR include large conferences not normally attended on a typical business day. The project management company would establish a parking program in the event the parking demand exceeds the supply during these special circumstances (i.e., potential use of the public parking areas). As noted in Mitigation Measure 5.12-4 of the Draft EIR, the use of public parking areas for hotel/golf uses during these special circumstances would be restricted unless approval from the City is obtained.

- 26L. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 26M. The special circumstances identified in the Draft EIR include large conferences not normally attended on a typical business day. The project management company would establish a parking program in the event the parking demand exceeds the supply during these special circumstances (i.e., potential use of the public parking areas). It should be noted that the City of Rancho Palos Verdes typically opens public parking areas at first light, and closes the parking areas at dusk. Therefore, the special events which are anticipated to occur in the evening hours, would not occur concurrently with the hours public parking areas would be open. Nonetheless, as noted in Mitigation Measure 5.12-4 of the Draft EIR, the use of public parking areas for hotel/golf uses during these special circumstances would be restricted unless approval from the City is obtained. With respect to the commentor's concerns regarding "access to hotel services in non-guest capacity" it is assumed the commentor is referring to the general public's access to the restaurants, spa, and other amenities onsite. It should be noted that the parking needs of non-hotel guests utilizing these amenities is inherently included in the 825 parking spaces provided for the resort hotel (i.e. this use would not detract from the 100 public parking spaces available at the RHA and UPVA).
- 26N. Comments are noted and will be considered by the City of Rancho Palos Verdes.

# **RESPONSE TO RESIDENTS' COMMENTS**

## RESPONSE TO RESIDENTS' COMMENTS

### **Response to Comment No. 27**

*Glenous Absmeier, A.I.A., Resident*

March 28, 2001

27A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

### **Response to Comment No. 28**

*Maggie Aelit-Louis, Resident*

March 26, 2001

28A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

### **Response to Comment No. 29**

*Bill, Kay, and Barry Aiken, Residents*

March 7, 2001

29A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

### **Response to Comment No. 30**

*Thomas L. Alley, Resident*

March 14, 2001

30A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

### **Response to Comment No. 31**

*Dr. and Mrs. Ralph B. Allman, Jr., Residents*

March 28, 2001 (Letter incorrectly notes April 28, 2001)

31A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 32**

*Dorothea Alpert, Resident*

March 3, 2001

- 32A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 32B. Refer to Response to Comment Nos. 1N and 5A.
- 32C. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 33**

*Charles W. Amico, Resident*

March 24, 2001

- 33A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 34**

*Alicia Anderson, Resident*

March 26, 2001

- 34A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 35**

*Brittney Anderson, Resident*

March 26, 2001

- 35A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 36**

*Todd Anderson, Resident*

March 26, 2001

- 36A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 37**

*Todd Anderson, Senior Vice President Cushman Realty Corporation*

March 28, 2001

- 37A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 38**

*John Tupper and Cindy Andreotti, Residents*

March 28, 2001

- 38A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 39**

*Glenn Arbuthnot, Resident*

March 3, 2001

- 39A. These comments do not raise a new environmental issue. Refer to Section 5.12, *Traffic and Circulation*, for a discussion of traffic issues/mitigation.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 39B. Section 5.0, *Description of Environmental Setting, Impacts and Mitigation Measures*, includes for each issue area an analysis of the cumulative impacts of the relevant projects (those which are listed in Table 4-1, *Approved and Pending Projects in Rancho Palos Verdes*). Further, as noted in Section 5.11, *Public Services and Utilities*, cumulative impacts on public services and utilities (i.e., electrical) anticipated to result from the Long Point Resort Project are not considered to be significant.
- 39C. Refer to Response to Comment No. 39B. As noted in Section 5.12, *Traffic and Circulation*, the study area intersections are projected to operate at Level of Service "D" or better during the peak hours for the Existing Plus Ambient Growth Plus Proposed Project Plus Other Development Cumulative traffic conditions.
- 39D. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 40**

*Edith Balog, Resident*

March 8, 2001

40A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 41**

*Bernard Barbeito, Resident*

April 3, 2001

41A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 42**

42A. Intentionally left blank.

**Response to Comment No. 43**

*Ruth Bescoby, Resident*

March 28, 2001

43A. Refer to Response to Comment Nos. 1N and 5I. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 44**

*Ruth Bescoby, Resident*

March 28, 2001

44A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 45**

*Dr. & Mrs. Ron Blackwelder, Residents*

*Mr. & Mrs. Kermit Olson, Residents*

February 12, 2001

45A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.



**Response to Comment No. 46**

*Walter and Meredith Bloss, Residents*

March 27, 2001

- 46A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 47**

*Mr. & Mrs. Nicholas Brajevich, Residents*

March 26, 2001

- 47A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 48**

*David Brunone, Resident*

February 12, 2001

- 48A. This comment does not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 49**

*Dave and Marshan Brunone, Residents*

March 28, 2001

- 49A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 50**

*Holly Cain, Resident*

March 10, 2001

- 50A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 50B. No lighting is proposed for the golf course or practice facility. It should be noted that development of the practice facility building would necessitate interior lighting and limited exterior lighting. Analysis concluded that impacts associated with lighting are less than significant.

Page 5.1-24 of the Draft EIR has been revised in the Final EIR as follows:

No lighting of the golf course or practice facility is proposed or required;. However, development of the practice facility building would necessitate interior lighting and limited exterior lighting including street lighting, building illumination and security lighting. The Applicant shall comply with City Development Code Section 17.56.040, *Outdoor Lighting for Non-Residential Uses*, which requires a Lighting Plan detailing the location, height, number of lights, wattage, estimates of maximum illumination on site and spill/glare at property lines. Compliance with the Development Code would reduce potential impacts to less than significant levels.

A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility.

A Peer Review and Safety Analysis was conducted to confirm that the layout, routing and grading would not conflict with safety as it relates to residential units, adjacent holes, streets, and pedestrian traffic. As discussed in Section 5.10, *Public Health and Safety*, the practice facility plays into a steep hillside, is graded to collect balls toward the center and there is adequate buffer distance between the north edge of the range and the property boundary. However, two alternative modifications to the range's design were identified to improve it's relationship with the residential home sites. Potential safety impacts associated with the practice facility would be reduced to less than significant levels with implementation of mitigation requiring incorporation of the specified design modifications.

Further, the Safety Analysis concluded that the potential for conflict with errant shots existed in certain areas. Unless mitigated, these safety impacts would be considered significant. Mitigation was specified in the Draft EIR (Mitigation Measures 5.10-2a and 5.10-2b) requiring that each of the recommendations identified be implemented. These measures would reduce impacts in regards to golf safety to a less than significant level. Mitigation requiring that the golf course design be subject to final review and approval by the City would further reduce the potential impacts in this regard to a less than significant level.

Consistent with CEQA Guidelines Section 15131(a) which states that "economic or social effects of a project shall not be treated as significant effects on the environment", the financial impact of liability insurance is not within the scope of this environmental analysis. Finally, these issues will be considered by the City's Finance Advisory Committee.

50C. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 51**

*Holly Cain, Resident*  
March 13, 2001

51A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 52**

*CA Nan C, Resident*  
February 12, 2001

52A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 53**

*Chris, Joan, Casey, and Chelsea Carbonel, Residents*  
March 29, 2001

53A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 54**

*John Carmichael, Attorney Representing SOC II*  
Kulik, Gottesman & Mouton, LLP  
April 6, 2001

54A. As noted in Section 1.4, *Introduction and Purpose*, of the Draft EIR, the EIR was subject to a 60-day review period by responsible and trustee agencies and interested parties. The 60-day review period is in excess of the 45-day CEQA required review period. Further, in accordance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, as amended, the City of Rancho Palos Verdes, serving as the Lead Agency, published a notice of availability of the Draft EIR in the Palos Verdes Peninsula News (a newspaper of general circulation) and prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse (proof of publication is available at the City Hall). A copy of the NOC was provided at the front of the Draft EIR. Therefore, responsible and trustee agencies, as well as interested parties, were given ample opportunity to comment on the Draft EIR.

These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 54B. A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility. Therefore, impacts associated with view obstruction due to safety netting or fencing would not occur.

Also, refer to Response to Comment No. 50B.

- 54C. CEQA Guidelines Section 15126.6(d) states that “the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. . . . If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” In compliance with this Section of the CEQA Guidelines, Section 7.0, along with the Exhibits contained therein, has provided sufficient information and an adequate level of detail about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project. CEQA does not require visual simulations for each alternative, nor would such analysis be feasible.

A discussion of the potential impacts to the visual character of the Upper Point Vicente Area are discussed in Section 5.1-2, *Long-Term Impacts - Visual Character*. Although these proposed improvements would transform the character of the UPVA from a generally undeveloped to a developed condition, they would not be considered a degradation to the character of the site or its surroundings. The UPVA would remain in an “open” condition, similar in character to the existing site condition and visually compatible with existing surrounding land uses. Further, the proposed Project would be in compliance with each of the zoning districts on the UPVA (refer to Section 5.7, *Land Use and Relevant Planning*) and would be required to demonstrate compliance with the specified development standards for each district regarding lot size, building height, lot coverage and parking. Additionally, it should be noted that a Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility. Utility lines would be placed underground in accordance with the City’s Development Code. Compliance with applicable Development Codes for each zoning district would reduce impacts to a less than significant level.

54D. A General Plan Amendment on the UPVA changing the land use designation from Recreational Passive to Recreational Active is considered a less than significant impact for the following reasons:

- As detailed in Table 5.7-2, *General Plan Consistency Analysis*, the proposed Project is considered consistent with all of the applicable goals and policies in the General Plan;
- The General Plan Urban Environment Element contains recommendations for development which pertain to the UPVA. These are outlined in the *Existing Conditions* discussion in Section 5.7, *Land Use and Relevant Planning*. This Element identifies areas set aside in the City for a structured use. The UPVA is a designated Recreational Activity area: the Project proposes development of recreational uses in this area, therefore, would be consistent with the designated use;
- The Urban Environment Element recommends the incorporation of active recreational facilities at the lower Nike Site: the Project proposes that the overall use of the UPVA be a golf course which is an active recreational use. Therefore, the proposed Project would be considered consistent with this recommendation;
- The Urban Environment Element recommends that the Nike Site be designated for park purposes: the Project proposes the development of passive parkland (a total of 2.2 acres of passive parkland), pedestrian trails and scenic view points on the UPVA, as well as a golf course and practice facility. Therefore, the proposed Project would be considered consistent with this recommendation.

As the analysis has concluded that the proposed Project would not conflict with the policies and regulations of the City of Rancho Palos Verdes General Plan, and the recommendations for development which pertain to the UPVA, development of the proposed golf course and practice facility on the UPVA would not be considered a significant land use impact with approval of the General Plan Amendment. Further, it should be noted that the General Plan currently contemplates the uses proposed by the Applicant for the UPVA and provides a mechanism for implementing the proposed uses.

54E. Comments are noted and will be considered by the City of Rancho Palos Verdes. Cumulative biological impacts are addressed in Section 5.3-5, *Cumulative Impacts*.

Both the Oceanfront project site (formerly referred to as the Subregion 1 site) and the Ocean Trails site were evaluated with regards to their cumulative impacts. Mitigation included participation in the 4(d) Interim Habitat Loss Permit program pursuant to the City's NCCP and through a HCP in accordance with Section 10 of

the FESA, respectively. Both of these projects were permitted by the USFWS for removal of coastal sage scrub and gnatcatcher habitat.

In the absence of an approved NCCP program, cumulative impacts to coastal sage scrub by the proposed Project and recently approved projects by the City will be mitigated to a level of less than significant through mitigation requirements (preservation/enhancement/restoration) of the 4 (d) special rule process for recently approved projects and the proposed LPHCP for the Project.

Refer to Response to Comment No. 1DD.

54F. Refer to Response to Comment No. 5G.

54G. Refer to Response to Comment No. 1N and 54E.

54H. As stated in Section 5.4-1, *Cultural Resources*, potential cumulative impacts would be site specific and an evaluation of potential impacts would be conducted on a project-by-project basis. This would be especially true of those developments located in areas considered to have a high sensitivity for cultural (archaeological, paleontological, and historical) resources. Each incremental development would be required to comply with all applicable State and Federal regulations concerning preservation, salvage, or handling of cultural resources. In consideration of these regulations, potential cumulative impacts upon cultural resources would not be considered significant.

Consistent with industry standards, Mitigation Measures would involve monitoring by qualified paleontological and/or archaeological monitors. Should any items of historical significance be unearthed during grading activities, the monitor shall temporarily halt or divert construction equipment to allow recordation, evaluation, and/or removal of artifacts. Should these artifacts have a historical significance, a report of findings with an appended itemized inventory of recovered artifacts would be submitted to the appropriate Lead Agency, and would signify completion of the program to mitigate impacts to cultural resources.

54I. Refer to Response to Comment 11R.

54J. As noted in Section 5.6 of the Draft EIR, *Hydrology and Drainage*, development of the Long Point Resort may result in long-term impacts to the quality of storm water and urban runoff, subsequently impacting water quality. Impacts would be reduced to less than significant levels with incorporation of the proposed Water Quality Management Plan, the specified Mitigation Measures, and State, County, and City requirements.

The California Coastal Commission received a copy of the Notice of Preparation and the Draft EIR and were notified of the public review period. In compliance with CEQA Guidelines, this agency along with the public at large, was given ample opportunity to comment on the proposed Project. To date, no comments have been received from the California Coastal Commission.

54K. Refer to Response to Comment Nos. 54D and 18D.

As noted in Section 5.7-3, *Coastal Specific Plan*, the proposed Project is considered consistent with all of the applicable goals and policies in the Coastal Specific Plan (refer to Table 5.7-3, *Coastal Specific Plan Consistency Analysis*). Further, implementation of the proposed Project would not conflict with the recommendations for development identified in the CSP (which pertain to the RHA). However, the proposed Project would necessitate approval of a Conditional Use Permit (CUP) consistent with the CSP requirement that a CUP be obtained for "any future development on the site." Impacts would be considered as less than significant with approval of a CUP.

54L. As noted in Section 5.7-4, *Development Code/Zoning Ordinance*, implementation of the proposed Project would not conflict with the land use plan, policies and regulations of the City of Rancho Palos Verdes Development Code. However, the proposed Project would require approval of Conditional Use Permits: for development of the proposed golf course, driving range and related ancillary uses in the OR District of the UPVA; for development of the proposed golf course in the I District of the UPVA; and for development of the proposed resort/conference hotel, and golf course proposed in the CR District of the RHA. Therefore, Project implementation would not result in a significant impact with respect to compliance with the Development Code.

Prior to Project approval, the proposed development would be required to demonstrate compliance with the applicable development standards for each zoning district. Additionally, the Project would be subject to design review by the City to ensure conformance with applicable Development Code Standards.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

54M. Page 5.9-23 of the Draft EIR, has been revised in the Final EIR as follows:

5.9-3 *Long-term resort operations associated with the proposed Project would result in the generation of on-site noise associated with club house activities, loading/unloading activities, mechanical equipment, parking lots, maintenance, etc. The analysis has concluded that impacts would be reduced to less than significant levels with adherence to City Noise Ordinance requirements standards which*

~~includes shielding of equipment, loading activities and other related limitations~~ **and implementation of the specified Mitigation Measures.**

Page 5.9-24 of the Draft EIR has been revised in the Final EIR as follows:

Due to the distance between . . . . would not occur.

### **Golf-Related Noise**

Noise generated from the golf course from golfing and/or maintenance activities at the practice facility would potentially affect the adjacent church and residential sensitive receptors located within the condominium complex. Noise from golf balls being driven is momentary and therefore anticipated to be negligible.

The main source of noise from the practice facility would be that of maintenance equipment, primarily from ball retrieving machines and gas lawn mowers. The closest point that the maintenance equipment would be from St. Paul's Lutheran Church would be approximately 75 feet. The closest point that maintenance equipment would be from Villa Capri residences would be approximately 150 feet. Noise from ball retrievers and gas lawnmowers is estimated at approximately 70 dBA at a distance of five feet. For each doubling of distance from a point noise source (i.e. lawnmower), the sound level will decrease by 6 dBA. Additionally, walls attenuate noise at an average of 9 dBA. Based on the distance between the church and closest point of maintained area, momentary noise levels of up to 50 dBA may occur at the property line. Based on distance and the presence of a wall along the perimeter of the Villa Capri Condominium Complex, momentary noise levels may reach 40 dBA at the property line. Although these maintenance activities would operate for brief periods of time, they would increase ambient noise levels in the Project vicinity.

The landscaping activities (i.e., lawn mowers) on the Project site would be subject to Development Code Section 17.56.020(B), *Conduct of Construction and Landscaping Activities*, which states the following:

*"It is unlawful to carry on construction, grading or landscaping activities or to operate heavy equipment between the hours of seven a.m. and seven p.m., Monday through Saturday. No such activity shall be permitted on Sunday or legal holidays, . . . ."*



The practice facility would be developed within an area designated as Open Space Recreation (OR) District (Section 17.34). Development standards for this District do not specify regulations for mechanical equipment. Therefore, the development standards for Commercial Districts have been applied since they are considered applicable to the proposed practice facility. The ball retrieving machines on the Project site would be subject to Development Code Section 17.12.030(F), which states the following:

*“Unless otherwise specified in an approved conditional use permit or other discretionary approval, all deliveries of commercial goods and supplies; trash pick-up, including the use of parking lot trash sweepers; and the operation of machinery or mechanical equipment which emits noise levels in excess of sixty-five dBA, as measured from the closest property line to the mechanical equipment, shall only be allowed on commercial properties which abut a residential district, between the hours of seven a.m. and seven p.m., Monday through Sunday.”*

Compliance with the Development Code with respect to ball retrieving machines and gas lawn mowers would ensure that impacts in this regard remain at less than significant levels.

- 54N. CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” In compliance with this Section of the CEQA Guidelines, Section 7.0, *Alternatives to The Proposed Project*, describes a range of alternatives and evaluates the comparative merits of the alternatives and the proposed Project as identified in Section 3.0, *Project Description*. Further, CEQA Guidelines Section 15126.6(d) states that “the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project. . . . If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” In compliance with this Section of the CEQA Guidelines, Section 7.0, along with the Exhibits contained therein, has provided sufficient information and an adequate level of detail about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project.

Refer to Response to Comment No. 54C.

In the event the decision was made by the City to implement an Alternative other than the proposed Project, a Safety Analysis would be conducted for that Alternative's particular golf design. Mitigation would be specified (similar to Mitigation Measures 5.10-2a and 5.10-2b) requiring that each of the recommendations identified in the Safety Analysis be implemented. Additionally, mitigation requiring that the Alternative's golf course design be subject to final review and approval by the City would further reduce the potential impacts in this regard to a less than significant level.

A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility. Therefore, impacts associated with view obstruction due to safety netting or fencing would not occur.

54O. Refer to Response to Comment No. 26A.

As discussed in Section 5.10, *Public Health and Safety*, it is anticipated that traffic flow would be temporarily impacted during construction of the proposed roadway improvements (i.e., including the tunnel). However, Project compliance with City Development Code 12.04.040, Section 128, would be required. This Section of the Code outlines specific requirements with respect to street construction for any person engaged in performing work which interferes with or endangers the safe movement of traffic.

It is acknowledged that roadways in the Project vicinity, including Hawthorne Boulevard, may experience temporary traffic inconveniences and delays during the construction phase of the Project. These would be associated with the delivery of construction equipment and materials to the site, as well as construction workers commuting to and from the site. Construction equipment and materials would be delivered to the site sporadically for the length of the construction phase. Construction workers would be anticipated to commute to the site every workday. A significant effect to traffic conditions would not be anticipated with these construction-related traffic volumes. Additionally, it should be noted that the proposed Project would not result in trucks delivering or carrying away soil from the construction site since the Project proposes that cut and fill be balanced on-site.

Further, it should be noted that lighting and gating of the tunnel would be required by the City as safety measures. The exact specifications of the lighting and gating would be determined by the City at the design stage of the tunnel.

54P. Mitigation is not necessary since analysis has concluded that the trails (and their alignment) proposed as part of the Long Point Resort Project would be consistent with the policies and recommendations identified in the General Plan, Coastal Specific Plan, Conceptual Trails Plan, and Conceptual Bikeways Plan (refer to Section 5.13, *Recreation*).

Refer to Response to Comment No. 5I.

54Q. This letter incorporates by reference the comments made by George Gleghorn in his letter of March 13, 2001 which has been included in this document as Comment Letter No. 106 (refer to Response to Comment No. 106).

54R. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 55**

*R. H. Carter-Siewertsen, Resident*

February 16, 2001

55A. As noted in Section 5.5, *Geology and Soils*, development of the proposed Project may increase the number of people/structures exposed to potential significant effects associated with landslides. Based on information currently available, portions of the development adjacent to the existing landslides could be significantly impacted by renewed landslide movement resulting from strong ground motion from nearby earthquakes, potential groundwater buildup within the landslides, erosion at the toe of the bluff from storm generated waves, and ongoing natural erosion of the bluffs. Implementation of the specified mitigation and compliance with the City Development Code and the California Building Code would reduce potential impacts to less than significant levels.

Refer to Response to Comment No. 39B.

55B. As discussed in Section 5.13, *Recreation*, and 5.7, *Land Use and Relevant Planning*, the proposed Project would not conflict with the policies and recommendations identified in the General Plan and Coastal Specific Plan with respect to coastal access. Analysis has concluded that the Project would be consistent with the recommendations and a less than significant impact would occur.

Also, refer to Response to Comment Nos. 18D and 54D.

55C. Comments are noted and will be considered by the City of Rancho Palos Verdes. Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration.

55D. Impacts associated with Biological Resources are addressed in Section 5.3 of the Draft EIR, *Biological Resources*.

55E. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 56**

*Bernard Chaisson, Resident*

March 7, 2001

56A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 57**

*Bernard Chaisson, Resident*

March 9, 2001

57A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 58**

*Cindy Chaisson, Resident*

March 8, 2001

58A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 59**

*D.E. Clarke, Resident*

March 14, 2001

59A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 60**

*Herbert and Dodie Clarkson, Residents*

March 31, 2001

60A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 61**

*Herb and Dodie Clarkson, Residents*

April 6, 2001

61A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 62**

*Mr. & Mrs. Robert L. Cole, Residents*

March 9, 2001

62A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 63**

*Cooper Family, Residents*

March 28, 2001 (Letter incorrectly notes April 28, 2001)

63A. Refer to Response to Comment No. 12A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 64**

*Barbara Covey, Resident*

March 26, 2001

64A. As noted in Section 5.12, *Traffic and Circulation*, the Project itself is expected to have a significant traffic impact at three (3) study area intersections projected to operate at Level of Service "E" or "F" during the peak hours including the following:

- Silver Spur Road (NS) at Hawthorne Boulevard (EW);
- Hawthorne Boulevard (NS) at Palos Verdes Drive North (EW); and
- Western Avenue (NS) at 25th Street (EW).

Therefore, impacts to these intersections (i.e., LOS "E" or "F") would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation at these intersections (refer to Mitigation Measures 5.12-1a through 5.12-1e).

**Response to Comment No. 65**

*Barbara L. Covey, Resident*

March 15, 2001

- 65A. As noted in Section 5.12, *Traffic and Circulation*, a traffic signal would be warranted at the Palos Verdes Drive East (NS) at Palos Verdes Drive South (EW) intersection for existing plus ambient growth plus other development traffic conditions. Thus, the traffic signal is projected to be warranted with or without implementation of the proposed Project. Additionally, it should be noted that the Project itself is not expected to have a significant traffic impact as this intersection (refer to Table 5.12-10 of the Draft EIR, *Project Traffic Contribution*.

The “other development,” which includes a total of ten projects, is listed in Table 5.12-7, *Other Development Trip Generation*.

Also, refer to Response to Comment Nos 11V.4 and 64A.

**Response to Comment No. 66**

*Jeanne A. Crosby, Resident*

March 13, 2001

- 66A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 67**

*Keelin Marie Deason, Resident*

March 26, 2001

- 67A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 68**

*Mark Detwiler, Resident*

March 28, 2001

- 68A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 69**

*Suzanne & Mark Detwiler, Residents*

March 13, 2001

- 69A. It should be noted that the Portuguese Bend segment of Palos Verdes Drive South is frequently re-surfaced, not due to the volume of traffic traveling along this roadway, rather due to the ongoing ground movement.

Further, it should be noted that the City is not selling the UPVA.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 70**

*Rowland Driskell, Resident*

March 7, 2001

- 70A. It should be noted that Alternative 7.9, *Point Vicente Park Enhancement Alternative*, is presented for comparison purposes only and no formal application is before the City for consideration. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 71**

*Rowland Driskell, Resident*

March 14, 2001

- 71A. Refer to Response to Comment No. 50B.
- 71B. Refer to Response to Comment No. 54M.
- 71C. Refer to Response to Comment No. 1R.
- 71D. The proposed golf course practice range is not tributary to the watershed at Villa Capri. As illustrated in Draft EIR Exhibit 5.6-1, *Proposed Conditions Hydrology Map No. 1*, and Exhibit 5.6-2, *Proposed Conditions Hydrology Map No. 2*, subwatershed W3A, the practice facility is designed to direct flows downstream of and away from the Villa Capri area. Therefore, there is no expected change in flows effecting the Villa Capri site.
- 71E. Refer to Response to Comment No. 54D.

**Response to Comment No. 72**

*Rowland Driskell, Resident*

March 14, 2001

72A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

72B. Refer to Response to Comment No. 50B.

A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility.

72C. Refer to Response to Comment No. 1R.

72D. Refer to Response to Comment No. 54M.

Additionally, the specified mitigation requires that a subsequent noise analysis be prepared during preparation of the Final Development Plans, demonstrating that site placement of stationary noise sources would not exceed City Code criteria for adjacent residences. Therefore, long-term stationary noise generated from proposed uses would be reduced to a less than significant level.

72E. Refer to Response to Comment No. 71D.

**Response to Comment No. 73**

*Rowland Driskell, Resident*

March 17, 2001

73A. Refer to Response to Comment No. 50B.

73B. Refer to Response to Comment Nos. 54M and 72D.

73C. Refer to Response to Comment No. 64A.

73D. As stated in Section 5.13, *Recreation*, the proposed Project is anticipated to increase the use of existing parks and facilities as a result of the employment created by the proposed resort hotel and golf course uses. The employment generated by the proposed Project would have the potential to create a demand for approximately 8.2 acres of parkland. The Long Point Resort Project proposes the development of 10.2 acres of various recreational features including public parking, parks, trails, coastal access, and a shore area. Of these 10.2 acres, approximately 5.0 acres of general public parkland are proposed. Further, the Project involves development of a nine-hole golf course and a practice facility totaling 71 acres. The



Resort Hotel Project proposes the development of recreational uses in excess of the demand it would potentially create, as well as provide a net increase in the total amount of recreational facilities which would be available in the City. Therefore, Project implementation would not increase the use of existing facilities such that substantial physical deterioration would occur and a significant impact is not anticipated in this regard.

It should also be noted that the proposed development has the potential to increase the use of existing parks and facilities as a result of the transient population associated with the resort hotel. However, as the proposed hotel is designed as a destination resort offering onsite recreational amenities including a spa/health center, pools, decks, landscaped grounds, walkways, etc., as well as the golf course and practice facility, a significant impact to existing recreational facilities is not anticipated in relation to the transient population.

**Response to Comment No. 74**

*Rowland Driskell, Resident*

March 18, 2001

- 74A. Pursuant to Section 15131 of CEQA Guidelines, which states that “economic or social information may be included in an EIR or may be presented in whatever form the agency desires,” the Fiscal Study has not been included in the Draft EIR. CEQA Guidelines Section 15131(a) further state that “economic or social effects of a project shall not be treated as significant effects on the environment”. Finally, these issues will be considered by the City’s Finance Advisory Committee.

**Response to Comment No. 75**

*Rowland Driskell, Resident*

March 15, 2001

- 75A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 76**

*Rowland Driskell, Resident*

March 26, 2001

- 76A. Refer to Response to Comment No. 64A.

**Response to Comment No. 77**

*Rowland Driskel, Resident*

April 4, 2001

77A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

In the event the decision was made by the City to implement Alternative No. 7.5, mitigation would be specified (similar to Mitigation Measures 5.10-2a and 5.10-2b) requiring that each of the recommendations identified in the Peer Review and Safety Analysis be implemented. Additionally, mitigation requiring that Alternative No. 7.5's golf course design be subject to final review and approval by the City would further reduce the potential impacts in this regard to a less than significant level.

77B. Refer to Response to Comment Nos. 1B and 77A.

77C. Refer to Response to Comment No. 50B.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

77D. As noted in Section 5.10, *Public Health and Safety*, analysis concluded that impacts associated with the site conditions and the historical use of the Upper Point Vicente Area are considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of the specified Mitigation Measures.

Further, as noted in Section 7.9, *Point Vicente Park Enhancement Alternative*, when compared to the proposed Project, the potential to create a significant hazard to the public or the environment on the UPVA through the disposal of hazardous materials would be similar with Alternative 7.9. The need to conduct a Phase II level investigation on the UPVA to determine the level of potential contamination associated with the historic use of the property would also be required with this Alternative.

77E. The traffic study follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (MTA). Based upon the County of Los Angeles traffic study guidelines, the study area should include arterial highways, freeways, and intersections generally within a one-mile radius of the Project site. 1<sup>st</sup> Street is located at least 5 miles from the Project site. In addition, Western Avenue/1<sup>st</sup> Street and Gaffey Street/1<sup>st</sup> Street are not listed as CMP arterial monitoring intersections within the Los Angeles County Congestion Management Program.

While it is acknowledged that 1<sup>st</sup> Street is used heavily by the local residents, the proposed Project is not expected to generate the same distribution pattern since it is fundamentally different than the existing residential areas surrounding the site. As noted in Section 5.12, *Traffic and Circulation*, trip distribution represents the directional orientation of traffic to and from the Project site. Trip distribution is heavily influenced by the geographical location of the site, the location of residential, commercial and recreational opportunities and the proximity to the regional freeway system. The directional orientation of traffic was determined by evaluating existing land uses and highways within the community and existing traffic volumes. Therefore and as illustrated on Exhibit 5.12-3 of the Draft EIR, *Project Trip Distribution*, an estimated 5% of the traffic associated with the proposed Project was distributed within the residential area situated east of Western Avenue, and not onto 1<sup>st</sup> Street specifically. It should also be noted that the resort hotel would provide directional assistance within promotional material that would affect patrons driving patterns for visiting the Project site. More specifically, this directional assistance would be accomplished through the following:

- hotel web site;
- hotel brochure;
- airport shuttles;
- employee manual
- hotel telephone recordings; and
- local cable network.

Therefore, it is not anticipated that 1<sup>st</sup> Street would be significantly impacted by implementation of the proposed Project.

#### **Response to Comment No. 78**

*Rowland Driskell, Resident*

April 5, 2001

78A. Refer to Response to Comment No. 71D.

78B. As stated in this comment and in Section 5.10, *Public Health and Safety*, the golf course design proposed by the Project adheres to standards developed during the 1960's and 1970's. This is simply a notation of the time period in which these standards were developed. Further, these standards are adequate to address public safety concerns and many architects still use them as the corridor widths that must be maintained to have an acceptable hole width. These standards were developed assuming an unrestricted flat site with little or no vegetation (to be used as a buffer). Additionally, it should be noted that some architects will suggest using a buffer (or setback). This depends upon the topography of the site, the existing (or proposed) vegetation, and the design of the course. This setback may be as much as 50 feet on each side of the hole (as it relates to property boundaries) or may be non-existent if the property is well supported by a higher slope or dense vegetation.

It should also be noted that this does not imply that 50 feet is necessary everywhere or even in most places since this would not be the case.

An area that the 50 foot buffer may be necessary is where the property falls off (lowers) dramatically outside of the golf corridor. An example of this is the proposed Hole No. 2. In this example, an adequate buffer exists to allow errant shots to be contained on the “downhill” side of the hole (in addition to the containment bunkering on the low side of the hole).

In general, the buffer is somewhat arbitrary - and should be dictated to a large extent by the architect taking into account all of the aforementioned considerations of topography, vegetation and design.

The golf course can be designed to maintain the 150 foot minimal width (centerline to property boundary) and also incorporate an adequate buffer (if necessary - dependent upon all the factors previously mentioned. Modern standards still use a 300 foot corridor width, however, some architects also add the buffer - typically at the discretion of the architect.

This comment notes that “The only successful golf projects...”. Mr. Kipp Schulties, Golf Safety Expert, is not in agreement with this statement. Success is a relative term based on an individual’s opinion of something. While in the perfect world, the golf course and surrounding residential would be built together, it is by no means a failure if they are done separately.

The golf course design is not poorly conceived, although, there are certain issues that needed to be modified or resolved to meet certain guidelines. Nonetheless, rerouting would not be necessary to accomplish this.

It is incorrect to state that Mr. Kipp Schulties has been asked to accomplish the impossible. On the contrary, he is of the opinion that the golf course can be constructed on the property provided the measures which have been outlined are implemented.

- 78C. A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility. Therefore, impacts associated with view obstruction due to safety netting or fencing would not occur.

Also, refer to Response to Comment No. 50B.

78D. This comment fails to identify which Mitigation Measures are unacceptable and the basis for that determination. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 79**

*Rowland Driskell, Resident*

April 6, 2001

79A. Refer to Response to Comment Nos. 54M and 18D.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

79B. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 80**

*Rowland Driskell, Resident*

April 6, 2001

80A. Refer to Response to Comment Nos. 1B and 54N.

**Response to Comment No. 81**

*Rowland Driskell, Resident*

April 6, 2001

81A. Subsection 5.3-2, *Sensitive Natural Communities/Habitats*, provides a detailed discussion on impacts to native species/habitat associated with the golf course. Further as noted in this Subsection, of particular concern is the location of golf course features within and adjacent to coastal sage scrub preservation and creation areas in the UPVA. Although trails will be established within the golf course area to keep golfers out of the natural areas, the proposed Project has the potential for golfers to enter the natural areas to retrieve lost balls or other reasons. This disturbance would be considered potentially significant since it may significantly impact habitat protected by state and federal resource agencies. Implementation of mitigation including the following measures would reduce this impact to less than significant:

- Develop a Fencing Plan;
- Develop a Signage Plan; and
- Establish a transition zone to buffer natural habitats from developed areas.

**Response to Comment No. 82**

*Rowland Driskell, Resident*

April 6, 2001

- 82A. Mr. Kipp Schulties is a Golf Safety Expert and not a Biologist. Also, refer to Response to Comment No. 81A.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 83**

*Rowland Driskell, Resident*

April 6, 2001

- 83A. According to Mr. Kipp Schulties, he is not privileged to the Nicklaus Design corridor standards mentioned in this comment. In all of their golf course specifications, in no instance does any specification say anything about corridor widths. The only other documented guideline for golf course corridor widths is in public distribution - a book by recognized golf course architect Michael Hurdzan. In the book, Mr. Hurdzan uses the same 150 foot minimum distance as in recent discussions and the Golf Safety Study while recommending a buffer (outside the property boundary) depending on wind, topography, altitude, vegetation, and other relating factors.

Most golf course architects have their own guidelines that they use when routing a golf course. In the perfect world, there would be no homes along the course, however, in today's market that is not feasible in many cases. If homes are to be situated along the course, the golf course architect desires to have those homes as far from the course as possible such that they do not impact the aesthetic value of the course and the property.

Kipp Schulties Golf Design, Inc. (KSGD) utilizes 350 to 375 feet for golf hole corridor width. While that is not the minimum width, it is simply the width preferred by KSGD and many other architects. The minimum width used by KSGD is 300 feet, although this is not a standard developed by KSGD. This is the standard that most of the other golf course architects use.

Of three new courses that Nicklaus Design is redesigning in South Florida, all three have corridor widths of approximately 300 feet, according to Mr. Schulties. In addition, at the new Nicklaus Designed course in Jupiter, Florida (the Bear's Club), the 18th green is no more than 150 feet from the base of the clubhouse and there are several areas on the course where homes are approximately 150 feet off the centerline.

While it is recommended that these larger distances for corridor widths be utilized, not always are those recommendations followed. However, most all golf course architects will honor the almost "universal" guideline of 150 feet from centerline to property boundary as it relates to landing areas and greens. This is what is of concern in this matter. This is not a "wish list" of what golf course architects desire for corridor widths, but rather what they will all agree are acceptable minimal widths that will still meet their safety standards.

Further, regardless that the corridor width for proposed holes 3 and 4 is approximately 520 feet, the distance from the centerline of the third hole to the property line at Via Capri is approximately 245 feet. At this distance away, the hole could move closer to Via Capri by at least 45 feet and still be of no concern (based on KSGD guidelines or even Mr. Nicklaus' standards for that matter).

It should be noted that Mr. Schulties is a golf course architect having been trained indirectly under the Nicklaus standards of design by numerous former lead designers of Jack Nicklaus.

Wind is certainly a factor to consider as mentioned by this Commentor. However, as previously mentioned, there is a sufficient buffer area between Via Capri and the centerline of the third hole to accommodate this factor. Secondly, the hole is played such that the "slice" side of the hole is away from Via Capri as the majority of golfers slice the ball (to the right if right handed) rather than hook it to the left. Also, the upward nature of the hole would keep balls from traveling as far as if the hole were flat or downhill. In addition, the presence of the tall grasses or native area between the course and the Via Capri would also serve as a "catch" for errant shots.

Additionally, refer to Response to Comment No. 78B.

#### **Response to Comment No. 84**

*Rowland Driskell, Resident*

April 6, 2001

- 84A. As discussed in Section 3.0, *Project Description*, the proposed Project involves improvements to the City-owned property situated off-site, between the UPVA and Hawthorne Boulevard. Proposed improvements include relocation of the City's existing Corporate Yard (including approximately ten parking spaces) to an approximately 1.0-acre site situated between the existing Civic Center entryway and the Salvation Army's tennis courts. The Facility is proposed to include an approximately 3,150-square foot equipment storage building (with office and storage space), an outdoor bulk storage space, and a parking area containing 30 employee parking spaces (for use by City employees). The proposed equipment storage building would be recessed into the hillside and a retaining wall would be provided along the northern site boundary to screen visibility of the facility from Hawthorne Boulevard.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 84B. While Project implementation would increase the volume of traffic on Palos Verdes Drive South, it would not result in a significant impact at any of the intersections along this roadway (refer to Table 5.12-10, *Project Traffic Contribution*). Additionally, refer to Response to Comment No. 64A.
- 84C. Refer to Response to Comment No. 77E.
- 84D. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 84E. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 85**

*Rowland Driskell, Resident*

April 6, 2001

- 85A. The issue of potential litigation is not within the scope of CEQA. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 85B. Refer to Response to Comment Nos. 50B and 54N.
- 85C. Refer to Response to Comment No. 78B.

**Response to Comment No. 86**

*Jeff Duncan, Resident*

March 13, 2001

- 86A. This comment does not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.
- 86B. As noted Section 5.9 of the Draft EIR, *Noise*, several local roadways would experience noise levels in the future above standards in the absence of the proposed Project. Since the Project generated trips would further exacerbate a projected exceedance of standards beyond established thresholds, implementation of the proposed Project would contribute to a significant and unavoidable impact for adjacent residential areas along the following roadway segments:
- Palos Verdes Drive West (from Palos Verdes Drive to Hawthorne Boulevard);
  - Palos Verdes Drive South (from Hawthorne Boulevard to Palos Verdes Drive East);
  - 25<sup>th</sup> Street (from Palos Verdes Drive East to Western Avenue); and



- Hawthorne Boulevard (from Palos Verdes Drive South to Palos Verdes Drive North).

As noted in Section 5.12, *Traffic and Circulation*, the Project itself is expected to have a significant traffic impact at three (3) study area intersections which are projected to operate at Level of Service "E" or "F" during the peak hours. Impacts to these intersections would be considered significant unless mitigated. However, impacts would be reduced to less than significant levels with implementation of mitigation.

- 86C. It should be noted that the Portuguese Bend segment of Palos Verdes Drive South is frequently re-surfaced, not due to the volume of traffic traveling along this roadway, rather due to the ongoing ground movement.

**Response to Comment No. 87**

*Brentt and Erin Eads, Residents*

April 1, 2001

- 87A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 88**

*Alfred J. and Deanne L. Edridge, Residents*

February 7, 2001

- 88A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 88B. Refer to Response to Comment No. 50B.

**Response to Comment No. 89**

*Ahktar Emon, Resident*

February 12, 2001

- 89A. The Project's proposed Planning Area 2-F, *City Hall Park Expansion*, involves a 1.6-acre expansion to the existing park facility including passive recreational uses. Although the proposed Project would not involve the development of a Community Center at the Rancho Palos Verdes City Hall site, its implementation would not preclude future development of such a use in the Civic Center area.

Additionally, as stated in Section 3.0 of the Draft EIR, *Project Description*, it should be noted that the Project proposes ballroom, banquet, meeting, and community space. This space would be made available for conferences, social occasions, and community and public events.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 90**

*Jack & Barbara Epstein, Residents*

March 10, 2001

90A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 91**

*Will & Mary Ann Felando, Residents*

March 9, 2001

91A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 92**

*Harold & Florence Fenton, Residents*

March 25, 2001

92A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 93**

*Bill & Marty Foster, Residents*

March 11, 2001

93A. Refer to Response to Comment No. 18D.

Alternative 7.9, *Point Vicente Park Enhancement Alternative*, and Alternative 7.8, *Program of Utilization Alternative*, involve development of the Upper Point Vicente Area for park/recreational use. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 94**

This Response was intentionally omitted.

**Response to Comment No. 95**

*Dr. and Mrs. James French, Residents*

March 28, 2001

- 95A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 96**

*Dena Friedson, Resident*

March 13, 2001

- 96A. The transport of soil from one location to another would not be required since the Project proposes that cut and fill be balanced on-site.
- 96B. As stated in Section 5.2, *Air Quality*, significant short-term air quality impacts may occur during site preparation and project construction. These impacts are considered significant before and after mitigation for NOX emissions from construction equipment exhaust and significant before and after mitigation for PM10 fugitive dust. Impacts would be less than significant for other pollutants. (Mitigation in this instance refers to applicable City Development Code Sections and SCAQMD Rules.)

As stated in Section 5.9, *Noise*, grading and construction within the Project area may result in temporary noise impacts to nearby noise sensitive receptors. Adherence to City Code requirements would reduce construction noise impacts to a less than significant level.

- 96C. Pages 5.3-45 and -46 of the Draft EIR state the following in regards to impacts to "threatened plant and animal species": Section 15065(a), *Mandatory Findings of Significance*, of the CEQA Guidelines states that a project may have a significant effect on the environment if "...the project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species..." (underlining added). Impacts to state or federally listed species or those species that meet the criteria as defined by CEQA were identified as significant in the Draft EIR unless mitigated.

Other common (not listed as threatened or Endangered) plant and wildlife species that may be impacted by the proposed Project do not pass the significance criteria established by the City for this project under the CEQA because populations of common plant and wildlife species would not be significantly reduced in the region.

In regards to significant impacts on “important corridors”, Appendix G of the CEQA Guidelines contains the Initial Study Environmental Checklist form which includes questions relating to biological resources. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this Draft EIR section.

CEQA states that *a project may create a significant environmental impact if the project interferes substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites.* Based on the thresholds established, the proposed Project does not interfere substantially with the movement of wildlife species because: (1) the cliffs of the RHA that are expected to provide a narrow linkage for wildlife east and west of the site will be maintained as permanent open space and would not be impacted; (2) the design of the UPVA area has maintained a connection to the open space areas off-site; and (3) the preserved habitat areas onsite and the proposed coastal sage scrub creation areas on the UPVA site are expected to provide for local movement on and off-site.

Mitigation to address potential indirect impacts to native habitat types and special status plant and wildlife species by the proposed golf course uses are included as Mitigation Measures 5.3-2a, 5.3-2c through e, and 5.3-2g. Implementation of these measures would reduce the potential disturbance of the golf course activities to less than significant.

96D. Refer to Response to Comment Nos. 11R and 55A.

96E. As noted in Section 5.1, *Aesthetics/Light and Glare*, Project implementation would not have a substantial adverse effect on a scenic vista or resource identified in the General Plan after compliance with applicable City codes. However, Project implementation would have a substantial adverse effect on a scenic vista or resource identified in the Coastal Specific Plan. The obstruction of views to Point Fermin (foreground only) would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation requiring that buildings within the Point Fermin vista corridor be one-story or redesigned to comply with the 16-foot height limit. Additionally, the obstruction of views to Catalina Island by the northernmost resort villas would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation requiring that these buildings be redesigned to comply with the 16-foot height limitation. Further, the proposed Project would be required to demonstrate compliance with the specified development standards for each zoning district regarding lot size, building height, lot coverage and parking. Compliance with applicable Development Codes for each zoning district would reduce impacts to a less than significant level. Additionally, Project design, height

and architecture would be subject to design review by the City to ensure conformance with applicable Development Code Standards. After compliance with applicable City codes, potential impacts would be considered as less than significant.

Additionally, refer to Response to Comment Nos. 17F.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 96F. The Ishibashi Farmhouse Complex, discussed on Page 5.4-21 is located at the northeastern corner of the Resort Hotel Area- not in proximity to Hole No. 5 on the Upper Point Vicente Area. Analysis has concluded that since the complex does not meet CEQA Guidelines' definition of a historical resource, impacts from implementation of the proposed Project would not constitute a significant effect to a resource.

The farm area located in proximity to Hole No. 5 on the Upper Point Vicente Area, is a truck farm operated by James Hatano and planted mostly in cactus. It contains a modern trailer and several wooden sheds, and no features that demonstrate any historic characteristics. Analysis has concluded that since no historic features are evident at the Hatano farm, no further consideration is required for that location.

- 96G. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 97**

*Dena Friedson, Resident*

March 13, 2001

- 97A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 98**

*Dena Friedson, Resident*

March 13, 2001

- 98A. Refer to Response to Comment No. 96F.

**Response to Comment No. 99**

*Dena Friedson, Resident*

March 26, 2001

- 99A. The earthwork quantity for the construction of the undercrossing is estimated to be approximately 5,000 cubic yards.

The construction of the undercrossing can be accomplished in phases allowing traffic on Palos Verdes Drive South access to at least one lane in each direction. As shown during the recent road reconstruction in the Portugese Bend area where traffic was reduced to one lane only, with proper traffic control, no unreasonable loss of travel time was experienced.

This work would best be accomplished during the first phase of the Project in order to lessen any traffic traveling to and from Upper Point Vicente from the Resort Hotel Area. The length of time for construction would vary depending upon the method used by the contractor. However, ninety working days would be a reasonable estimate for construction.

Also, refer to Response to Comment No. 54O.

- 99B. The aspect of "trenching" for an undercrossing beneath Palos Verdes Drive South is anticipated to be constructed via actual tunneling. If actual open-cut trenching were to be performed, the resulting "slot-cut" would not be expected to have a detrimental impact on slope stability, either during or following completion of the undercrossing. Based on the results of more recent exploratory drilling by the developer's geotechnical consultant, no evidence of a landslide was found in this area. Moreover, the results of a slope stability analyses by the developer's geotechnical consultant has demonstrated the area is stable, based on the results of drilling and geologic logging of four (4) borings in this area.

- 99C. Refer to Response to Comment Nos. 3B, 54O and 99A.

- 99D. Refer to Response to Comment No. 64A.

Furthermore, the Project shall be required to contribute its share towards the improvement costs at these locations. Implementation of the specified mitigation would result in no remaining significant impacts at the Hawthorne Boulevard intersections.

- 99E. Excluding the UPVA from the proposed Project would not eliminate the significant and unavoidable air quality impacts (i.e., from ROG, NOX and CO emissions) since the Basin is in non-attainment for these three pollutants. Therefore, development of the RHA only would also be anticipated to result in significant and unavoidable air quality impacts.

Additionally, refer to Response to Comment No. 54O.

**Response to Comment No. 100**

*Ann Shaw and Dena Friedson, Residents*

Save Our Coastline II

April 4, 2001

100A. Refer to Response to Comment Nos. 18J, 96B and 99E.

The Long Point Resort Project as proposed involves the development of both the Upper Point Vicente Area and the Resort Hotel Area. The analysis contained in Section 5.2, *Air Quality*, takes into consideration development of the Project in its entirety. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 101**

*C.H. Fung, D.D.S., Resident*

March 3, 2001

101A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 102**

*Barbara Gleghorn, Resident*

March 9, 2001

102A. Refer to Response to Comment Nos. 18, 22, 24 and 25.

**Response to Comment No. 103**

*Save Our Coastline II*

March 13, 2001

103A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 104**

*Barbara Gleghorn, Resident*

Save Our Coastline II

April 4, 2001

104A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

104B. Refer to Response to Comment Nos. 5I and 54P.

As noted in Section 5.13, *Recreation*, implementation of the proposed Project has the potential to create a demand for an additional 8.2 acres of parkland. Additionally, the proposed Project would require removal of approximately two acres of the existing Civic Center Park for golf course use. However, the Project also proposes the development of approximately 5.0 acres of general public parkland, 5.2 acres of public trails, staging areas, and coastal access ways, as well as a 71-acre golf course/practice facility. Accordingly, Project implementation would result in a net increase in recreational facilities in the City of 71 acres, therefore, a significant impact is not anticipated in this regard. Further, the City would continue to exceed their target goal for parkland after Project implementation.

**Response to Comment No. 105**

*Barbara Gleghorn and Dena Friedson, Residents*

April 5, 2001

105A. The proposed Project would impact approximately 25% of the scrub habitats onsite. However, these areas are proposed to be mitigated by the creation of 16.80 acres of new coastal sage scrub habitat area outlined in Mitigation Measure 5.3-1d of the Draft EIR. This, combined with the 14.63 acres of existing coastal sage scrub habitat, the 4.44 acres of coastal bluff scrub habitat, and the 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat. The 16.80 acres of restored and newly created habitat represents a replacement ratio of 3.4 to 1 (3.4 acres restored/created habitat for every 1 acre removed) for the 4.91 acres of coastal sage scrub impacted by the proposed Project. With the addition of 22.94 acres of preserved coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff to the mitigation program, the compensation ratio is over 7 to 1, far above typical mitigation standards required by the U.S. Fish and Wildlife Service of 2 to 1 and 3 to 1.

Refer to Response to Comment No. 134C.

105B. Refer to Response to Comment No. 1N.



Although there is no set rule with regards to the required mitigation ratio that at the U.S. Fish and Wildlife Service requires during the processing of a 4(d) Interim Habitat Loss Plan, 10(a) permit, or through a Section 7 consultation pursuant to the federal Endangered Species Act, there are industry standards and precedent. A mitigation ratio of 3.4 to 1 is generally greater than the commonly accepted ratio of 1 to 1 or 2 to 1.

One of the preferred forms of mitigation is preservation of existing habitat. The regulatory agencies prefer this form of mitigation because it provides for the long-term protection of the resources. With the preservation of natural open space areas through conservation easements and the inclusion of restricted uses over the site, the resources can be ensured to persist over time. Natural open space areas that are not currently managed open space are subject to impacts such as the creation of unauthorized trails, harassment by hikers and pets, and trash dumping. The UPVA is not currently fenced to protect the natural resources in this area. The proposed Project would provide appropriate fencing of this area to restrict unauthorized use of these areas and eliminate the potential disturbance of the preserved habitat.

105C. Refer to Response to Comment No. 105A and 105B. Comments are noted and will be considered by the City of Rancho Palos Verdes.

#### **Response to Comment No. 106**

*George J. Gleghorn*

Save Our Coastline II (SOC II)

March 13, 2001

106A. Refer to Response to Comment Nos. 1C, 11W and 54C.

Pursuant to CEQA Guidelines Section 15126.6(e)(1), "the specific alternative of "no project" shall also be evaluated along with its impact". Further, Section 15126.6(C) states that "after defining the no project alternative. . . the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably to expected to occur in the foreseeable future if the project were not approved, based on current plans. . .".

106B. Section 7.2 of the Draft EIR, *No Project Alternative*, has been revised in the Final EIR in response to the availability of additional details regarding the existing entitlement (refer to Volume I, *Final EIR*).

106C. Refer to Response to Comment No. 106B.

106D. Refer to Response to Comment No. 106B.

106E. Refer to Response to Comment No. 106B.

106F. Refer to Response to Comment No. 106B.

106G. Refer to Response to Comment No. 106B.

106H. Refer to Response to Comment No. 106B.

106I. Refer to Response to Comment No. 106B.

106J. Refer to Response to Comment No. 106B.

**Response to Comment No. 107**

*George J. Gleghorn*

Save Our Coastline II Steering Committee

April 5, 2001

107A. Refer to Response to Comment Nos. 1B and 54N.

107B. Refer to Response to Comment No. 50B.

107C. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 108**

*Diana Gottschalk, Resident*

April 5, 2001

108A. Comments are noted and will be considered by the City of Rancho Palos Verdes

**Response to Comment No. 109**

*Zelda and Jerry Green, Residents*

March 10, 2001

109A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 110**

*Zelda and Jerry Green, Residents*

March 10, 2001

110A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 111**

*Dan and Margaret Gruen, Residents*

March 30, 2001

111A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 112**

*Maria C. Guerra, M.D., Resident*

March 15, 2001

112A. As stated in Section 5.2-4, *Air Quality*, the mobile source and area emissions associated with the proposed Project would generate pollutant emissions in excess of SCAQMD thresholds. Thus, implementation of the proposed Project would create a significant and unavoidable individual project impact from ROG, NOX and CO emissions. In addition, the Basin is in non-attainment for these same three pollutants. As the proposed Project would exceed established ROG/NOX, CO and PM10 thresholds, the Project would create a significant and unavoidable *cumulative* impact to regional levels of these pollutants.

Further, in regard to localized CO emissions, upon implementation of the mitigation specified in the Traffic Impact Analysis, impacts would be reduced to a less than significant level and intersections would operate at acceptable LOS and intersections would not be significantly impacted by project generated traffic. As such, the Project is not anticipated to create a significant localized emission of CO or create significant localized impacts to nearby sensitive receptors in this regard.

Refer to Response to Comment No. 64A.

112B. As noted in Section 5.11, *Public Services and Utilities*, project implementation is anticipated to generate additional wastewater beyond current conditions and would require an incremental expansion of the existing sewerage system. However, with payment of appropriate connection fees impacts to wastewater systems and facilities would be considered as less than significant. Also, refer to Response to Comment No. 10.

112C. Refer to Response to Comment Nos. 18D, 54C, and 96E.

112D. Refer to Response to Comment Nos. 54M and 72D.

112E. Refer to Response to Comment No. 96E.

112F. Refer to Response to Comment No. 73D.

112G. Refer to Response to Comment No. 55A.

112H. It should be noted that the proposed Project would be subject to compliance with Development Code Section 17.12.030(B) which states the following with respect to storage:

*“ . . . . all goods, wares, merchandise, produce and other commodities [i.e., refuse] shall be housed in permanent, entirely enclosed structures, unless being transported”.*

Further, Section 17.12.060(B) notes that an application for commercial development shall include “a detailed landscape plan indicating types and sizes of materials to be used and enclosed trash areas”.

112I. The access locations along Palos Verdes Drive South have been recommended within the traffic study to minimize conflicting turning movements along routes serving through traffic and to provide safe intersections. Sight distance at the Project entrances will be further reviewed with respect to standard Caltrans/City of Rancho Palos Verdes sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

Refer to Response to Comment No. 64A.

### **Response to Comment No. 113**

*Bill & Gwen Gussman, Residents*

March 10, 2001

113A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 114**

*Bill & Gwen Gussman, Residents*

March 13, 2001

114A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 115**

*Robert C. Haase, Jr. Resident*

March 27, 2001

115A. Refer to Response to Comment No. 18D.

The following should be noted: (i) the project is consistent with the General Plan; (ii) the proposed use would not be authorized unless the National Park Service granted the requested amendment to the POE; (iii) describing the proposed golf course as a "public-use" golf course is not a mischaracterization as asserted by the commenter; (iv) if the City approved the project it would not constitute a "misappropriation of public parkland;" (v) the golf course and trail are open to the general public; and (vi) the RHA site is zoned for Commercial Recreational use and the current entitlements envision a similar (if not more intensive) development on the RHA.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

115B. The following thresholds of significance have been identified on Pages 5.1-18 and 5.1-19 of the Draft EIR:

A project would potentially create a significant aesthetic impact if it caused one or more of the following to occur:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; and/or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Analysis has concluded that development of the proposed Project may create a new source of light/glare which would adversely affect day or nighttime views in the area. However, compliance with applicable City codes would reduce potential impacts to less than significant levels. The discussion on Page 5.1-31 accurately notes that no significant impacts related to Aesthetics/Light and Glare have been identified following implementation of Mitigation Measures and/or compliance with applicable standards, policies and/or City of Rancho Palos Verdes Development Code.

Also, refer to Response to Comment No. 50B.

“Implementation of Mitigation Measures” constitutes the Applicant’s compliance with or execution of those measures listed in the *Mitigation Measures* section. Further, it should be noted that consistent with CEQA Guidelines Section 15097, a Mitigation Monitoring and Reporting Program would be adopted by the City of Rancho Palos Verdes for the proposed Project. The Program would ensure that the Mitigation Measures and project revisions identified in the EIR are implemented.

115C. Section 5.7, *Land Use and Relevant Planning*, of the Draft EIR acknowledges that a General Plan Amendment (GPA) would be required for the UPVA. Analysis has concluded that a less than significant impact would occur with approval of the GPA on the UPVA changing the land use designation from Recreational Passive to Recreational Active. Also, refer to Response to Comment Nos. 54D and 54L.

115D. In the Statement of Overriding Considerations, CEQA Guidelines require the decision-making agency (i.e., City of Rancho Palos Verdes) to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed projects against its unavoidable environmental risks when determining whether to approve the Project. If the City approves the Project, the City will prepare a written statement of the specific reasons to support its action based on the Final EIR and/or other information in the record.

Also, refer to Response to Comment No. 72D.

115E. Refer to Response to Comment Nos. 11V.4, 64A and 77E.

A transportation impact on an intersection shall be deemed “significant” if the project related increase in the volume to capacity ratio equals or exceeds the established threshold (Table 5.12-2, *Significant Transportation Impact*). A significant impact would not occur at any of the intersections cited in this comment. Further, it should be noted that the General Plan is not being amended to accommodate increased traffic congestion.

115F. Refer to Response to Comment No. 12A.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 116**

*Mike & Marilee Hagerthy, Residents*

March 13, 2001

116A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 117**

*Gretchen A. Harris, Resident*

March 31, 2001

117A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 118**

*Jim, Sachie, Erika, and Alisa Hathaway, Residents*

March 28, 2001

118A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 119**

*Bridget Heller, Resident*

February 13, 2001

119A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 120**

*Bridget Heller, Resident*

March 27, 2001

120A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 121**

*Judith Herman, Resident*

April 2, 2001

121A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility.

Also, refer to Response to Comment No. 50B.

**Response to Comment No. 122**

*Patricia Hewitt, Resident*

April 2, 2001

122A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 123**

*Jot & Linda Hollenbeck, Residents*

March 13, 2001

123A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 124**

*Ed Hong, Resident*

March 26, 2001

124A. Refer to Response to Comment No. 12A.

These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.



**Response to Comment No. 125**

*Edward & Joann Hummel, Residents*

March 27, 2001

125A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 126**

*William and Marianne Hunter, Residents*

March 13, 2001

126A. Refer to Response to Comment No. 55C. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 127**

*William and Marianne Hunter, Residents*

March 26, 2001

127A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 128**

*Leslie G. Jakobs, Resident*

February 16, 2001

128A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 129**

*Bernadette Jamison, Resident*

March 26, 2001

129A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 130**

*Cassie Jones, Resident*

March 27, 2001

130A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 131**

*Mary Ann & Joe Kapp, Residents*

March 11, 2001

131A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 132**

*Frank and Lea Kenny, Residents*

March 30, 2001

132A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

132B. Refer to Response to Comment Nos. 50B and 115B.

132C. A helipad for landing helicopters is not included as a part of the proposed Resort Hotel development.

132D. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 133**

*Howard King, Resident*

March 20, 2001

133A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 134**

*Jim Knight, Resident*

March 13, 2001

134A. The EIR evaluates a complete project description involving development of both the upper and lower areas of Point Vicente. Alternatives are presented in Section 7.0 that respond to the commentor's concern for definition of the Project and analysis of the areas. Further, it should be noted that there has been no attempt to mislead the public. Additionally, the commentor's statement regarding the Resolution adopted by City Council is incorrect. There was no resolution adopted on January 16, 2001. Rather, the City Council directed the Finance Advisory Committee to undertake an analysis of the financial implications to the Long Point Resort Project of scaling back the Project.

134B. Refer to Response to Comment Nos. 5A and 5G.

134C. It has been documented<sup>36</sup> that restored sage scrub and other habitat types, when done in a biologically sound manner and under supervision of a qualified biologist with experience in native plant restoration, can and will support a wide variety of native plant and animal species including those listed as threatened or endangered by the state and federal regulatory agencies. The creation of habitat is an approved form of mitigation by the regulatory agencies and is often a component of compensation/mitigation plans that are processed with these agencies.

Because of the mitigation of the proposed plan, including preservation, restoration, and protection of retained native habitats, it is expected that the proposed Project site will continue to support the gnatcatcher both for breeding and dispersal activity.

134D. Refer to Response to Comment Nos. 18D, 54D, 54K and 54L.

**Response to Comment No. 135**

*Jim Knight, Resident*

March 13, 2001

135A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

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<sup>36</sup> November 21, 2001. Year-end Report for the Ocean Trails HCP Area California Gnatcatcher Study, City of Rancho Palos Verdes, Los Angeles County, California - Permit # PRT-800922.

**Response to Comment No. 136***Jim Knight, Resident*

April 4, 2001

- 136A. Refer to Response to Comment No. 134A. Additionally, it should be noted that under CEQA, there is no requirement regarding separating the environmental analysis of the golf component and the hotel component.
- 136B. Alternative 7.9, *Point Vicente Park Enhancement Alternative*, does not involve the development of a resort hotel on the RHA and therefore, would not fulfill the objectives noted in this comment of establishing a successful destination coastal resort or improving water quality through construction and implementation of a Runoff Management/Water Quality Management Plan.

Page 7-46 of the Draft EIR has been revised in the Final EIR as follows:

Implementation of this alternative would fulfill ~~only one of the~~ **following** objectives identified in Section 3.4, *Project Objectives*: to provide additional public trails and recreational facilities on the publicly-owned Upper Point Vicente Site : **and the long-term protection, enhancement and increase of coastal sage scrub and native vegetation that would be consistent with the City's proposed NCCP Program and state and federal requirements.**

CEQA Guidelines Section 15126.6(d) states that “the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project. . . . If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” In compliance with this Section of the CEQA Guidelines, Section 7.0, along with the Exhibits contained therein, has provided sufficient information and an adequate level of detail about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project.

Section 7.0, *Alternatives to The Proposed Project*, has been expanded to include Alternative 7.10, *Point Vicente Park Enhancement and Existing Entitlement Alternative*.

- 136C. Table 4-1, *Approved and Pending Projects in Rancho Palos Verdes*, identifies related projects and other possible development in the area determined as having the potential to interact with the proposed Project to the extent that a significant cumulative effect may occur. Since the existing entitlement project and the currently proposed Project could not both be developed, the existing entitlement project is not included in Table 4-1.

136D. Refer to Response to Comment No. 136C. Further, it should be noted that the proposed Project and the Existing Entitlement project (i.e., Monaghan project) are mutually exclusive and, therefore, the impacts cannot be cumulative.

136E. The LPHCP is part of the public record for the Project and is available for review at the City of Rancho Palos Verdes.

The mitigation program outlined in the Draft EIR summarized the information in the LPHCP and provides sufficient information to determine that the impacts for the proposed Project can be mitigated to a level of less than significant. For additional information relative to mitigation for commutative Project impacts, refer to Response to Comment No. 5H.

136F. Refer to Response to Comment Nos. 1N, 5G, 54J, 96C, and 1DD.

136G. Although a NEPA document is required to be prepared for a Section 7.0 consultation and/or 10(a) permit, depending on the scope of the project this can be done through a internal document with the federal resource agencies and does not require an EIS.

136H. It should be noted that the City of Rancho Palos Verdes is a separate and sovereign entity from Los Angeles County and has adopted its own regulations and standards.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

136I. Refer to Response to Comment No. 134C.

136J. Comments are noted and will be considered by the City of Rancho Palos Verdes.

Also, refer to Response to Comment No. 17F.

136K. The legend in Exhibit 5.3-4 of the Draft EIR, *Biological Resources Preservation/Enhancements Within Upper Point Vicente Area*, has been revised to include the "Project Study Area" and the "Impact Area" (refer to Volume IV, *Revised Biological Resources Section*).

136L. The transport of soil from one location to another would not be required since the Project proposes that cut and fill be balanced on-site.

Refer to Response to Comment No. 1T.

136M. Refer to Response to Comment No. 1B.

136N. Fencing shall be located in disturbed areas, at the interface with the natural habitat areas to be preserved. No habitat would be removed to install the fencing material.

Refer to Response to Comment No. 1V.

136O. Refer to Response to Comment No. 1T.

136P. Refer to Response to Comment Nos. 1I, 1N, and 54J.

136Q. Refer to Response to Comment Nos. 1EE and 11S.

136R. Refer to Response to Comment Nos. 1EE and 11S.

136S. The County of Los Angeles Fire Department was consulted during preparation of the analysis of impacts to Fire Services. Additionally, the Fire Department was made aware of the Project's traffic volumes (i.e., 6,263 average daily trips) in that they received a copy of the Draft EIR and were notified of the public review period. Further, the Fire Department has submitted comments on the Draft EIR.

As previously noted, the County of Los Angeles Fire Department was consulted during preparation of the analysis of impacts to Fire Services. The Fire Department considered the analysis with respect to the helipad adequate. Further, the specified mitigation (Mitigation Measure 5.11-1) requires that the Project Applicant avoid Helispot Pad #53A or provide an alternate pad within the Project area.

Also, refer to Response to Comment No. 8.

136T. Refer to Response to Comment No. 50B.

136U. Refer to Response to Comment No. 50B.

136V. Refer to Response to Comment No. 77E.

136W. As stated in Section 21084(e): Guidelines shall list classes of projects exempt from Act. No project that may cause a substantial adverse change in the significance of an historical resource, as specified in Section 21084.1, shall be exempted from this division pursuant to subdivision (a).

21084.1. Historical resources

*A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources....*

As stated in Section 5.4 of the Draft EIR, *Cultural Resources*, since Site 19-180591 is located in an area proposed for a golf course, Project effects to this historical resource are potentially significant. The recommended mitigation identifies two separate options (i.e., avoidance or recordation) both of which reduce impacts to a less than significant level and are accepted practices.

No Categorical Exemption has been granted for any aspect of the proposed Project.

136X. Refer to Response to Comment No. 54D.

136Y. Refer to Response to Comment No. 55A.

As presented in the EIR “The potential for the building of groundwater beneath the Project area due to infiltration of landscape irrigation, storm water runoff, etc. appears to be unlikely given the pervasive fracturing of the bedrock beneath the area. However, the addition of storm water runoff, landscape irrigation for the golf course and resort areas, etc., could result in the localized building up of groundwater beneath the Project area. With the buildup of groundwater comes the increased potential of localized failures on the bluffs and/or reactivation of existing landslides due to the buildup of pore pressure in the rock and soil, and the possibility of groundwater acting to lubricate weak rock and soil layers. This impact would be considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of mitigation requiring groundwater monitoring wells and periodic visual reconnaissance.”

136Z. Refer to Response to Comment Nos. 18D and 54D.

CEQA Guidelines Section 15131(a) states that “economic or social effects of a project shall not be treated as significant effects on the environment” [emphasis added].

136AA. Refer to Response to Comment No. 18D.

136BB. Page 5.7-5 of the Draft EIR has been revised in the Final EIR as follows:

The Point Vicente Park facility is situated in the area surrounding the Civic Center. Amenities available at this facility include, but are not limited to, **informal hiking trails**, tennis courts and sand volley ball courts.

136cc. Refer to Response to Comment No. 55C and 96E.

As noted in Section 5.13, *Recreation*, analysis has concluded that the trails (and their alignment) proposed as part of the Long Point Resort Project would be consistent with the policies and recommendations identified in the General Plan, Coastal Specific Plan, Conceptual Trails Plan, and Conceptual Bikeways Plan. Further, both the Conceptual Bikeways Plan (Revised 1996) and the Conceptual Trails Plan (Revised September 1993) were developed by the City of Rancho Palos Verdes' Recreation Department along with the involvement of a recreation/parks committee. Inasmuch, safety concerns associated with joint use trails have been taken into consideration.

- 136DD. The statement made on Page 7-3 of the Draft EIR, "none of the improvements proposed would occur under this Alternative", is referring to Alternative 7.1, *No Development Alternative*, and not to Alternative 7.2, *No Project Alternative*, as the commentor alleges.

The discussion for Alternative 7.2 describes the development proposed under the existing entitlement, as well as the future build-out scenario.

The Draft EIR includes both a "no development" alternative (Alternative 7.1, *No Development Alternative*), and a "no project" alternative (Alternative 7.2, *No Project Alternative*).

Additionally, refer to Response to Comment Nos. 11W, 74A, 136C and 136D.

- 136EE. Refer to Response to Comment No. 1C.

- 136FF. Refer to Response to Comment Nos. 1G and 55C.

- 136GG. Refer to Response to Comment Nos. 17F and 55C.

- 136HH. Refer to Response to Comment No. 73D.

- 136II. Refer to Response to Comment No. 18C.

- 136JJ. Refer to Response to Comment Nos. 17F and 18C.

- 136KK. Refer to Response to Comment No. 18B. Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 136LL. Refer to Response to Comment No. 54C.

- 136MM. Comments are noted and will be considered by the City of Rancho Palos Verdes.

- 136NN. Refer to Response to Comment No. 1D.



**Response to Comment No. 137**

*Alex Knowles, Resident*

March 27, 2001

137A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes

**Response to Comment No. 138**

*Mahbooba S. Kohgadai, Walid Kohgadai and Omar Fazli, Residents*

April 3, 2001

138A. Refer to Response to Comment No. 64A.

138B. Refer to Response to Comment Nos. 18J and 96B.

138C. As noted in Section 5.11 of the Draft EIR, *Public Services and Utilities*, the proposed Project would not result in significant physical impacts with respect to fire or police protection. Potential impacts are considered less than significant after mitigation and compliance with all applicable codes and ordinances.

138D. Refer to Response to Comment No. 50B.

138E. Refer to Response to Comment Nos. 54C and 96E.

138F. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

138G. Refer to Response to Comment No. 39B.

138H. Refer to Response to Comment No. 96E.

**Response to Comment No. 139**

*Nils Kolderup, Resident*

March 27, 2001

139A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 140**

*Ken & Mary Konopasek, Residents*

March 9, 2001

140A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 141**

*Doris Koplik, Resident*

March 12, 2001

141A. Refer to Response to Comment No. 96E. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 142**

*Jane M. Koplik, Resident*

March 12, 2001

142A. Refer to Response to Comment No. 96E.

142B. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 143**

*Joseph Kukel, Resident*

March 29, 2001

143A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 144**

*Benjamin Qwan, Resident*

March 7, 2001

144A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 145**

*Kristina Lee, Resident*

March 26, 2001

145A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 146**

*Marlys Lindenmuth, Resident*

April 4, 2001

146A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 147**

*Alfred Cellier, Resident*

March 18, 2001

147A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 148**

*Angela Lukstein, Resident*

March 26, 2001

145A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 149**

*Janis and Eduard Lukenstein, Residents*

April 4, 2001

149A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 150**

*Leah Marinkovich, Resident*

February 17, 2001

150A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 151**

*Mr. and Mrs. Ronald A. Marinkovich, Residents*

April 2, 2001

151A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 152**

*Betty Marlr, Resident*

March 10, 2001

152A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 153**

*Betty Marler, Resident*

April 2, 2001

153A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 154**

*Jim & Connie McCarthy*

February 17, 2001

154A. This comment does not pertain to the Long Point Resort Project.

154B. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

154C. This comment does not pertain to the Long Point Resort Project.

**Response to Comment No. 155**

*Louis R. McCreight, Resident*

March 10, 2001

155A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 156**

*Stephen & Linda\ McDannold, Residents*

March 12, 2001

156A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 157**

*Madeleine McJones, Resident*

March 3, 2001

157A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 158**

*RW McJones, Resident*

February 12, 2001

158A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

158B. Section 5.4, *Cultural Resources*, provides a detailed discussion of the former Nike anti-aircraft missile launching area (Site 19-18059) and identifies it as a relic of the Cold War between the United States and the Soviet Union. The EIR further notes that Project effects to this historical resource are potentially significant. The recommended mitigation identifies two separate options that may reduce impacts to a less than significant level: preserving components of the site and incorporating them into the Project design or the implementation of recordation procedures compatible to Level 2 of HABS/HAER.

**Response to Comment No. 159**

*Dick Meng, Resident*

March 28, 2001

159A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 160**

*Bruno Michetti, Resident*

March 9, 2001

160A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 161**

*Bruno Michetti, Resident*

March 9, 2001

161A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 162**

*Kathleen Morgan, Resident*

March 8, 2001

162A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

162B. Refer to Response to Comment No. 64A. Analysis has concluded that impacts to Palos Verdes Drive South would be less than significant.

162C. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 163**

*Dorrine Nay, Resident*

March 26, 2001

163A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 164**

*Karyl Newton, Resident*

March 15, 2001

164A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes

**Response to Comment No. 165**

*John Nunn, Resident*

April 5, 2001

165A. This comment letter is not legible.

**Response to Comment No. 166**

*Osair Omar and Barbora Omar, Residents*

April 3, 2001

166A. Refer to Response to Comment Nos. 19 and 64A.

166B. Refer to Response to Comment Nos. 18J and 96B.

166C. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 167**

*Mary & Charlie Oneb, Resident*

March 10, 2001

167A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 168**

*Patricia Ott, Resident*

February 12, 2001

168A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 169**

*Angie Papadakis, Resident*

March 12, 2001

169A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 170**

*William & Sandra Patton Jr., Residents*

March 10, 2001

170A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 171**

*Mr. & Mrs. Mark O. Payne, Residents*

March 20, 2001

171A. Refer to Response to Comment No. 54M.

171B. Refer to Response to Comment No. 50B.

171C. Refer to Response to Comment Nos. 50B and 115B.

171D. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 172**

*Paul A. Payne, Resident*

March 4, 2001

172A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 173**

*Paul A. Payne, Resident & President*

Villa Capri HOA

March 13, 2001

173A. Refer to Response to Comment Nos. 50B, 54M, 55A, and 71D.

173B. Comments are noted and will be considered by the City of Rancho Palos Verdes.



**Response to Comment No. 174**

*Paul A. Payne, Resident*

March 17, 2001

174A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

174B. Refer to Response to Comment Nos. 50B and 54M.

174C. The proposed habitat preservation and restoration outlined in the Draft EIR and illustrated on 5.3-4 increases the size of the sage scrub patches currently present on the UPVA, thus reducing the existing and potential fragmentation of native habitat patches on the Project site. Please note the Project proposes conversion of the existing annual grassland onsite to sage scrub habitat along the southern and western portions of the UPVA. The restoration of the habitats in these areas would increase the size of the existing habitat polygons and serve to connect these currently fragmented sage scrub areas with restored habitat. The proposed preservation and restoration areas also provide for a continued and increased connection to off-site areas. In regards to the connection to the Subregion 1 (Oceanfront) area, the proposed restoration plan would increase the amount of sage scrub habitat in the vicinity of where the two projects (UPVA/Subregion 1) are the closest. Sage scrub does not currently exist in this area and the proposed plan is anticipated to provide an increase in the potential linkage between these two areas by the restoration of sage scrub in this area.

Additionally, Mitigation Measure 5.3-1d identifies that the project applicant shall comply with the Federal Endangered Species Act (FESA) with regards to any impacts to the coastal California gnatcatcher, which is known to occur in the sage scrub habitat on-site. The commitment of the project applicant will be ensured by the U.S. Fish and Wildlife Service's (USFWS) enforcement of this act and the permit conditions that would apply to the proposed Project. Any permit to remove habitat and or impact a federally listed threatened or endangered species requires monitoring of the proposed action and reporting requirements for any proposed habitat restoration program. If the project applicant does not meet the success criteria established for the restoration program, the USFWS may require additional mitigation.

174D. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 175**

*Paul A. Payne, Resident*

March 21, 2001

175A. This comment letter is not commenting on the Draft. It is addressed to the SOC II steering committee.

**Response to Comment No. 176**

*D.A. Pehrson, Resident*

March 7, 2001

176A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 177**

*Norman Peterson, Resident*

April 3, 2001

177A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 178**

*Mark Pfeil, Resident*

March 12, 2001

178A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 179**

*Joseph J Picarelli*

St Paul's Lutheran Church

April 5, 2001

179A. Refer to Response to Comment No. 50B.

179B. Refer to Response to Comment Nos. 1B, 11X, and 77A.

179C. Refer to Response to Comment Nos. 1B and 77A.

179D. Refer to Response to Comment No. 78B.

The ULI material was reviewed by Mr. Kipp Schulties to enable anyone relating to the Project know what the recommendations/guidelines are. This is to provide information to make sound judgements on how things should interface. It is a guideline for everyone associated with the Project.

The issue of insurance liability is not within the scope of CEQA.

179E. Refer to Response to Comment Nos. 1B, 77A and 78B.

179F. Refer to Response to Comment Nos. 1B, 77A and 78B.

179G. Refer to Response to Comment No. 54M.

Page 5.9-24 of the Draft EIR has been revised in the Final EIR as follows:

Due to the distance between the **resort hotel** parking areas and sensitive noise receptors, significant noise impacts from the proposed parking lot would not occur **on the RHA.**

**The proposed practice facility would involve the development of 42 surface parking spaces along the un-named street located adjacent to St. Paul's Lutheran Church, on the UPVA. Assuming a typical noise level of 70 dBA at 50 feet, maximum noise levels at St. Paul's Lutheran Church would be approximately 75 dBA at a distance of 30 feet. It should be noted that these projections do not take into consideration the noise attenuation which would be provided by structures, walls, and other topography features (a reduction of 3 to 5 dBA). This impact would be considered significant unless mitigated since the parking lot would emit noise levels in excess of sixty-five dBA, as measured from the closest property line (at the Church) to the parking lot. With implementation of the specified mitigation requiring design level acoustical study, berms, landscaping and brushed driving surfaces, impacts in this regard would be reduced to a less than significant level.**

Page 5.9-26 of the Draft EIR has been revised in the Final EIR as follows:

**5.9-3a** Prior to Final Development Plan approval, a subsequent noise analysis shall be prepared, to the satisfaction of the Director of Planning and Building and the City Engineer, which demonstrates that site placement of stationary noise sources would not exceed noise standards indicated in the State Land Use Noise Compatibility Guidelines for adjacent residences.

**5.9-3b** Prior to Final Development Plan approval, a subsequent noise analysis shall be prepared, to the satisfaction of the Director of Planning and Building and the City Engineer, which demonstrates that all feasible sound attenuation has been incorporated into the practice facility's parking lot, such as berms, landscaping and brushed driving surfaces, such that noise from the parking lot would not exceed noise standards indicated in the State Land Use Noise Compatibility Guidelines for the adjacent Church.

179H. Refer to Response to Comment Nos. 1B, 77A and 78B.

**Response to Comment No. 180**

*Dan and Vicki Pinkham, Residents*

March 28, 2001

180A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 181**

*George A. Pisano, Resident*

March 28, 2001

181A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 182**

*Jan Porter, Resident*

March 10, 2001

182A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 183**

*Charles and Marty Powell, Residents*

March 12, 2001

183A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 184**

*Andrew Pride Jr., Resident*

March 26, 2001

184A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 185**

*Angela Pride, Resident*

March 26, 2001

185A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 186**

*Vic Quirarte, Resident*

March 8, 2001

186A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 187**

*Vic Quirarte, Resident*

March 13, 2001

187A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

187B. As noted in Section 5.3-1 of the Draft EIR, *Biological Resources*, Project implementation is anticipated to affect species identified as special status. Analysis has concluded that impacts would be mitigated to a less than significant level with the implementation of the identified Mitigation Measures. Additionally, Project implementation is anticipated to impact portions of the Resort Hotel and Upper Point Vicente Areas which are habitat for referenced sensitive species. Implementation of specified Mitigation Measures would reduce impacts to a less than significant level. Also, refer to Response to Comment No. 1R.

187C. Comments are noted and will be considered by the City of Rancho Palos Verdes. Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration.

187D. A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility. Therefore, impacts associated with view obstruction due to safety netting or fencing would not occur.

187E. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 188**

*Vic Quirarte, Resident*

March 25, 2001

188A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 189**

*Vic Quirarte, Resident*

March 26, 2001

189A. Refer to Response to Comment No. 50B.

189B. Refer to Response to Comment Nos. 54J and 55A.

189C. Refer to Response to Comment Nos. 18D and 54D.

189D. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

189E. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

189F. Refer to Response to Comment No. 50B.

189G. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 190**

*Jim Randall, Resident*

March 14, 2001

190A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 191**

*Steve Rankin, Resident*

March 22, 2001

191A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 192**

*Jorg and Anke Raue, Residents*

March 27, 2001

192A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 193**

*Sydelle Rennick, Resident*

March 10, 2001

193A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 194**

*Paula Reuben, Resident*

March 26, 2001

194A. Refer to Response to Comment No. 26A.

194B. The traffic counts within the traffic study were conducted in May, July and August, 1999. Although the July and August traffic counts occurred during the summer season, most trips generated by surrounding residential areas do not diminish. In fact, school travel activity on the overall street system is replaced by increased recreational and social activity caused by the presence of teenagers at home. In addition, some teenagers work seasonally during the summer while living at home and affect the AM and PM peak hours. When schools are in session, the AM peak hour is impacted, however, school activities do not typically affect the PM peak hour.

194C. Refer to Response to Comment No. 54O.

194D. Refer to Response to Comment No. 26A.

- 194E. Both the City of Rolling Hills Estates and the City of Torrance received a copy of the Notice of Preparation and the Draft EIR and were notified of the public review period. In compliance with CEQA Guidelines, these cities along with the public at large, were given ample opportunity to comment on the proposed Project. Additionally, it should be noted that neither City submitted comments on the Draft EIR.
- 194F. Adjacent to the Peninsula High School, the traffic study recommends the addition of a southbound right turn lane at the intersection of Silver Spur Road/Hawthorne Boulevard. This lane may require the restriction of parking at the north leg of the intersection. Students may have to park further north along Silver Spur Road with the provision of increased capacity at the Silver Spur Road/Hawthorne Boulevard intersection. Removal of parking would provide for increased visibility on the north leg of the Silver Spur Road/Hawthorne Boulevard intersection for pedestrians. Restriction of on-street parking in the vicinity of schools is generally considered as a safety improvement. It should be noted that on-street parking for the school represents overflow parking and the school's parking lot's existing inadequacy. Additionally, opening of the new high school (at the former location of Palos Verdes Intermediate School) would reduce the demand for parking at the Peninsula High School.

**Response to Comment No. 195**

*Mary Ross, Resident*

February 16, 2001

- 195A. This comment does not pertain to the Long Point Resort Project.
- 195B. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 196**

*Ronald Rothstein, Resident*

April 1, 2001

- 196A. Comments are noted and will be considered by the City of Rancho Palos Verdes.



**Response to Comment No. 197**

*Howard & Marilyn Russell, Residents*

March 8, 2001

197A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 198**

*Jack & Nina Satalich, Residents*

March 14, 2001

198A. The comment that a "...a map from the U.S. Geological Survey indicating a specific fault line running along the southern edge of Rancho Palos Verdes City Hall and cutting through Long Point" is inaccurate. There is no "recent" or any other U.S. Geological Survey map showing a fault in this area. The most recent map of the RPV area by and in cooperation with the U.S. Geological Survey, entitled "Geologic Map of the Palos Verde Peninsula and Vicinity...", by Thomas W. Dibblee, Jr., dated 1999, does not show a fault in the area discussed in the comment.

198B. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 199**

*Alfred Sattler, Residents*

April 6, 2001

199A. Refer to Response to Comment Nos. 1G and 5G.

**Response to Comment No. 200**

*Barbara Sattler, Resident*

March 14, 2001

200A. The focused surveys conducted by Dudek & Associates and the most recently conducted surveys are included within the Appendix to Volume IV, *Revised Biological Resources Section*. These surveys have been conducted according to resource agency protocol and/or industry standards during the most appropriate time periods to observe the special status species, if present onsite.

200B. CEQA does not require a separate evaluation of biological resource impacts on public lands. The findings in this documents relative to biological resource issues are consistent with the Significance Thresholds established for this project by the City. The cumulative impact evaluation extended through the Palos Verdes area.

200C. The Long Point Habitat and Conservation Program (LPHCP), which is incorporated into the Applicant's Permit Documentation package (June 23, 2000), is a part of the public record for the Project and is available for review at the City of Rancho Palos Verdes. The June 23, 2000 LPHCP was summarized in the Draft EIR and does not have to be "approved" for the Draft EIR to use to the information in the development of an appropriate mitigation strategy that would mitigate impacts to a level of less than significant for CEQA. Further, since the Draft EIR was completed, the LPHCP has been updated (June 27, 2001). The biological resources analysis has been revised to reflect the updated LPHCP (refer to Volume IV, *Revised Biological Resources Section*). Also, the updated LPHCP is included in the Appendix to Volume IV.

Please note that the LPHCP will be finalized at some time and must be approved by the USFWS. The proposed Project will need the approval of the USFWS if the project would directly impact coastal sage scrub and/or the gnatcatcher. The LPHCP can be modified by the USFWS to reflect the resource agencies' requests for additional/modified Mitigation Measures. However, any substantial changes to the LPHCP must also be approved by the City to ensure that the identified biological impacts that were deemed significant in the Draft EIR are fully mitigated by any revised version of the LPHCP.

200D. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

200E. Refer to Response to Comment No. 17F.

### **Response to Comment No. 201**

*Barbara Sattler, Resident*

April 6, 2001

201A. The Water Quality Management Plan and the Hydrology and Water Quality Technical Appendix which contain more detail on the proposed water quality management plan, including BMPs, are available for review at the City of Rancho Palos Verdes City Hall.

As discussed in Section 5.6, *Hydrology and Drainage*, it was determined that the current Water Quality Management Plan did not meet the SUSMP requirements for the design of several Standard BMPs. Mitigation has been specified which requires that, prior to Grading Permit issuance, the Applicant prepare, to the satisfaction of the Public Works Director, a Water Quality Management Plan, which includes Best Management Practices (BMPs), Structural Measures, and Adaptive Management, under the guidelines in *Development Planning for Storm Water Management- A Manual for the Standard Urban Stormwater Mitigation Plan (SUSMP)* prepared by Los Angeles County Department of Public Works dated May 2000. (The SUSMP is a new National Pollutant Discharge Elimination System (NPDES) Permit

requirement for Los Angeles County.) The mitigation also requires that the Water Quality Management Plan be revised to include additional Standard BMPs.

Additionally, it should be noted that an Erosion Control Plan will be prepared for review and approval by the City of Rancho Palos Verdes prior to Grading Permit issuance.

201B. The outfall structures (i.e., impact stilling basins) essentially consist of large grouted rock pads that are intended to dissipate energy. For aesthetic purposes, the rock pads could be covered with beach sand to minimize aesthetic impacts. It is likely that the structures would have to be re-covered periodically. The stilling basins would not be designed to hold water, but rather to provide erosion protection for the beach during high flow storm events. However, as previously noted, the elevations, design, and types of the outfall structures would be determined during the design phase of the Project. The proposed water quality BMPs on-site are expected help minimize impacts to human health and safety and marine life.

201C. Refer to Response to Comment No. 201B.

201D. Refer to Response to Comment No. 54J.

As noted in Section 5.6 of the Draft EIR, *Hydrology and Drainage*, the proposed Project would significantly alter the drainage patterns on the RHA which could be considered potentially significant to erosion potential. However, the Project proposes design features (i.e., proper bluff drainage and impact basin installation which would likely improve bluff stability and curb bluff erosion). The proposed Project would also slightly increase the amount of runoff leaving the site. However, because the downstream receiving water is the ocean, and because adequate outlet structures have been proposed, the increase in runoff is negligible and would not result in increased downstream flooding on- or off-site.

The five-year marine biological monitoring program proposed in the EIR is designed to ensure that source controls and BMPs within the Project design features and visitor use management strategies are satisfactorily protecting the beneficial uses of the receiving waters and shoreline marine life. A five-year sampling program would provide an adequate time series of events to evaluate inter-annual variation. Likewise, quarterly monitoring is proposed to evaluate seasonal effects (spring, summer, fall, and winter) and would also be useful in evaluating stormwater effects during the winter season (all runoff during the dry season would be diverted to the Sanitation system).

The adequacy of the monitoring program is equally dependent upon proper sampling design, selection of control (reference) and treatment (Long Point/Fisherman Cove) sites, and adequate sampling replication by qualified marine biologists to ensure that statistically reliable results can be obtained. The monitoring program that would be implemented would be standardized with other state-wide monitoring programs used by resource agencies such as the California Department of Fish and Game, Minerals Management Service, and local universities (UCLA, UC Santa Barbara, UC Irvine).

Therefore, the 5-year, quarterly monitoring program is considered sufficient to detect any adverse impacts on shoreline marine biological resources.

The monitoring program results would be evaluated on a yearly basis to ensure that any warning signs of degradation can be immediately addressed and Resort operations reviewed to determine if the Resort is the cause of any adverse impacts. Changes can subsequently be made to Resort operations or visitor use policies for the tide pools. At the end of the 5<sup>th</sup> year, the monitoring program results would be analyzed to make a final determination if the Resort management plans have been effective in preventing marine life degradation. If the results indicate that there was no significant marine life degradation attributable to the Resort operations, then the monitoring program, with the approval of the wildlife and resource agencies would be discontinued. The final decision to end or continue the monitoring program after five years would be the decision of the resource agencies.

**Response to Comment No. 202**

*Ken and Seta Saunders, Residents*

April 4, 2001

202A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 203**

*Monica Saunders, Resident*

April 2, 2001

203A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 204**

*Stephanie Saunders, Resident*

April 3, 2001

204A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 205**

*Laura Allman Schenasi, Resident*

March 29, 2001

205A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 206**

*John A. & Victoria V. Schoenfeld, Residents*

March 9, 2001

206A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 207**

*Mary Jane Schoenheider, Resident*

March 3, 2001

207A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 208**

*Ann Shaw, Resident*

March 13, 2001

208A. Refer to Response to Comment No. 78B.

208B. Refer to Response to Comment No. 50B.

208C. Refer to Response to Comment Nos. 1B and 54C.

208D. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 209**

*Ann Shaw, Resident*

March 30, 2001

209A. CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” In compliance with this Section of the CEQA Guidelines, Section 7.0, *Alternatives to The Proposed Project*, describes a range of alternatives and evaluates the comparative merits of the alternatives and the proposed Project as identified in Section 3.0, *Project Description*.

Refer to Response to Comment No. 1C.

**Response to Comment No. 210**

*Jerry Shurm, Resident*

March 9, 2001

210A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 211**

*Maria Spitz, Resident*

March 9, 2001

211A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 212**

*Gary and Pam Stahl, Residents*

April 1, 2001

212A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 213**

*Arlene & Jim Stansfield, Residents*

March 24, 2001

213A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 214**

*Mr. & Mrs. Neil Stefanides, Residents*

March 12, 2001

214A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 215**

*Debby Stegura, Resident*

March 28, 2001

215A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 216**

*Glen L. Steiger, Resident*

March 7, 2001

216A. It should be noted that neither Section 5.12, *Traffic and Circulation*, or Section 7.0, *Alternatives to the Proposed Project*, include a projection of traffic associated with the former Marineland Aquatic Park. Further, the EIR does not make the claim that when compared to Marineland traffic, the proposed Project's traffic would be similar.

Additionally, pursuant to CEQA Guidelines Section 15126.6, Section 7.0, *Alternatives to The Proposed Project*, evaluates the comparative merits of the Alternatives and the proposed Project as identified in Section 3.0, *Project Description*. Therefore, a comparative analysis of Alternative 7.2 and "Marineland in its prime" is not required under CEQA.

Additionally, refer to Response to Comment Nos. 11W and 106B.

**Response to Comment No. 217**

*Glen L. Steiger, Resident*

March 10, 2001

217A. The commentor accurately notes that the cut and fill is stated on two Pages in the Draft EIR: Page 3-30 and Page 5.8-21. The correct grading quantities are those noted on Page 3-30. The grading quantities noted on Page 5.8-21 are an inadvertent error. As a result, Page 5.8-21 of the Final EIR text has been revised in the Final EIR as follows:

Earthwork would result in approximately ~~550,000~~ **571,080** cubic yards of cut and ~~500,000~~ **541,080** cubic yards of fill.

217B. Page 3-31 of the Final EIR text is revised in the Draft EIR as follows:

According to the Grading Plan (October 2, 2000) for the UPVA, a total of 139,080 cubic yards (CY) of cut and 131,940 CY of fill are proposed. **Overall, the proposed Project would involve a total of 571,080 CY of cut and 541,080 CY of fill.** Based on these estimates, and in consideration for the five percent shrinkage factor, grading would be balanced on-site.

217C. Refer to Response to Comment No. 217A.

217D. Refer to Response to Comment No. 217A.

217E. The commentor's question is unclear. Cut and fill quantities are typically expressed in the context of construction quantities. The mitigation identified in Section 5.8 of the Draft EIR, *Marine Resources*, would not affect the quantities.

**Response to Comment No. 218**

*Glen L. Steiger, Resident*

March 13, 2001

218A. Refer to Response to Comment No. 51.

218B. Refer to Response to Comment No. 54C.

**Response to Comment No. 219**

*Glen Steiger, Resident*

March 29, 2001

219A. Refer to Response to Comment No. 11W.



**Response to Comment No. 220**

*Glen Steiger, Resident*

April 4, 2001

220A. Refer to Response to Comment No. 11W.

220B. Refer to Response to Comment No. 106B.

**Response to Comment No. 221**

*Glen Steiger, Resident*

April 5, 2001

221A. Section 3.0, *Project Description*, of this EIR, provides a detailed discussion on the practice facility. As the practice facility has been identified in Section 3.0 as a Project component, its impacts have been evaluated throughout Section 5.0, *Description of Environmental Setting, Impacts and Mitigation Measures*. Therefore, a separate statement of its impact on the environment is not necessary.

**Response to Comment No. 222**

*Glen Steiger, Resident*

SOC II

April 6, 2001

222A. Section 2.1, *Project Summary*, of this EIR, provides a detailed discussion of the land use districts. Portions of the conservation district, (i.e. the westerly bluffs and shoreline below the Resort Hotel) are not included in the "entitled Property Ownership" listed in Section 3-1, *Project Location and Setting*, as these areas are (RM-1), Resource Management Districts.

**Response to Comment No. 223**

*Patricia Stenchjem, Resident*

April 1, 2001

223A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 224**

*Douglas W. Stern, Resident*

March 8, 2001

224A. The U.S. Fish and Wildlife Service and California Department of Fish & Game March 1, 2001 letter referenced in this comment is included as Comment Letter No. 24. Therefore, refer to Response to Comment Nos. 24A through 24G.

**Response to Comment No. 225**

*Annette and Brent Stevens, Residents*

March 12, 2001

225A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 226**

*Ivan K. Stevenson, Resident*

March 27, 2001

226A. Refer to Response to Comment Nos. 54M and 72D.

This letter does not comment on the Draft EIR, rather requests a copy of the document. The City of Rancho Palos Verdes made a Draft EIR available to Mr. Stevenson on March 21, 2001.

**Response to Comment No. 227**

*Ivan Stevenson, Resident*

April 6, 2001

227A. The Draft EIR included a total of 68 exhibits. A visual simulation is not missing from the Draft EIR. Exhibit 5.1-5, *Key Map for Photo Simulations*, was incorrectly numbered, inadvertently omitting *Photo Simulation #11*. Therefore, Exhibit 5.1-5 of the Draft EIR has been revised in the Final EIR to reflect this correction and Exhibit 5.1-16, *Photo Simulation 11*, has been included in the Final EIR. Additionally, Page 5.1-22 of the Draft EIR text is revised in the Final EIR as follows:

Implementation of the proposed Project would permanently alter the nature and appearance of the UPVA from predominately undeveloped land to a golf course and practice facility (refer to Exhibit 5.1-14, *Photo Simulation 9*, Exhibit 5.1-15, *Photo Simulation 10*, and Exhibit 5.1-47 **16**, *Photo Simulation 42 11*).

227B. Refer to Response to Comment Nos. 54A.

227C. Refer to Response to Comment Nos. 227A and 227B.

227D. Comments are noted and will be considered by the City of Rancho Palos Verdes.

227E. Refer to Response to Comment No 227B.

227F. Comments are noted and will be considered by the City of Rancho Palos Verdes.

227G. Refer to Response to Comment Nos. 1T and 18I-15.

227H. Refer to Response to Comment No. 74A.

227I. Refer to Response to Comment Nos. 54O and 64A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

227J. Refer to Response to Comment Nos. 64A, 84A, 54O, 86C, and 77E.

The surrounding cities received a copy of the Notice of Preparation and the Draft EIR and were notified of the public review period. In compliance with CEQA Guidelines, these cities along with the public at large, were given ample opportunity to comment on the proposed Project. The City of Palos Verdes Estates' comments are included as Comment Letter Nos. 3, 4 and 297.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

227K. Refer to Response to Comment Nos. 1U and 115B.

It should be noted that the EIR analysis has not been slanted as implied by the commentator and, contrary to the commentator's insinuations, the EIR has been prepared by a consultant hired by the City not the developer.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

227L. Refer to Response to Comment Nos. 18J, 96B and 100A.

227M. Section 5.3-2 of the Draft EIR, *Biological Resources*, provides a detailed discussion on biological impacts associated with the proposed Project. Additionally, refer to Response to Comment Nos. 81A, 1T, 18I-15.

Indirect impacts are those related to disturbance by construction (such as noise, dust, and urban pollutants) and long-term use of the Project site and its effect on the adjacent habitat areas. The indirect impact discussion below includes a general assessment of the potential indirect affects (noise, dust and urban pollutants, lighting, human activity, and non-native species introduction), of the construction

and operation of the UPVA and RHA. Particular focus is placed on the indirect effects on the natural open space area on the UPVA and RHA, collectively referred to as edge effects.

Edge effects occur where development, including roads, takes place adjacent to natural open space areas. Edge effects threaten the ecological integrity, recreational experience, aesthetic quality, public investment, and safety operations of preserved natural areas. When development is configured in a manner that creates a high ratio of development edge to natural open space, there is an increase in the potential impacts caused by human use (indirect impacts). These indirect effects that address both the short-term construction and long-term use of the Project site are outlined below.

The increase in human activity (i.e., noise, foot traffic) would increase the disturbance of natural open space remaining on or adjacent to the UPVA and RHA. Human disturbance could disrupt normal foraging and breeding behavior of wildlife remaining in these and adjacent areas diminishing the value of these preserved open space habitat areas.

In addition, a detailed discussion regarding impacts to marine resources is provided in Section 5.8-2, of the Draft EIR, *Marine Resources*. As stated in this section, operation of the Long Point Resort Project has the potential to result in long term effects that could impact marine biological resources. Because the Project incorporates a long-term Runoff Management Plan/Water Quality Management Plan as a Project Design Feature, long term water quality impacts would be minimized. Remaining impacts would be reduced to less than significant levels with incorporation of the specified Mitigation Measures and compliance with State, County, and City Development Code requirements.

227N. Refer to Response to Comment Nos. 18I-15, 11R, 55A, and 227M. Comments are noted and will be considered by the City of Rancho Palos Verdes. In addition, refer to Exhibit 5.5-2, of the Final EIR, *Upper Point Vicente Area Geologic Map*, for locations of exploratory borings.

227O. As stated in Section 5.8, of the Draft EIR, *Marine Resources*, Coastal Resources Management conducted site-specific surveys of the rocky intertidal resources at Long Point and Fisherman's Cove on March 27 and March 28, 1998. The objective of the surveys was to inventory the habitat types and the assemblages of plants and animals which could be potentially affected by construction, development, or increased public access within the RHA. Additional marine biological surveys are specified as mitigation for a five-year period to ensure that the area's shoreline marine biological resources are not degraded from the operation of the Long Point Resort.

Section 5.8-3, of the Draft EIR, *Marine Resources*, provides a detailed discussion on the biological impacts to marine resources associated with visitor use. As stated in this Section, over 100 species of plants, invertebrates, and fishes have been documented within the tide pools along the Rancho Palos Verdes shoreline. Increased use of the tide pools by nature enthusiasts, fishermen, and potential poachers, could conceivably create additional pressures on the rocky intertidal and shallow subtidal habitats. This could contribute to long-term habitat degradation and reduction in rocky intertidal biodiversity through:

- The taking (collecting) of the larger, more conspicuous invertebrates (i.e., chitons, mussels, turban snails, sea stars, and wavy top snails);
- Trampling and smothering of turf-forming algae (i.e., *Gelidium/Corallina* complexes) and small, delicate upright species of algae (i.e., *Gigartina*, *Rhodomenia*, *Callophyllis*); colonial invertebrates (i.e., reef building worms, clonal anemones, and mussels) and inconspicuous soft-bodied invertebrates (anemones, sea hares, nudibranchs, sponges, and tunicates); and
- Increased fishing pressure on reef-associated species such as opaleye perch and kelp bass.

Without a visitor use plan, the potential impacts from increased visitor use would be a significant and long-term reduction in the value of the intertidal habitat. Intertidal marine resources in southern California are in a steady state of deterioration because of unmanaged or under-managed policies which regulate these areas.

Increased visitor use of the Long Point and Fisherman Cove shoreline could potentially result in an adverse, significant impact on rocky intertidal habitat and organisms. The Long Point and Fisherman's Cove rocky intertidal habitat could be degraded as a result of the development of the Long Point Resort. Of the two regions, the most accessible to the general public and the one that has a higher species richness and diversity is Fisherman's Cove. The primary periods of increased visitor use would be from Memorial Day to Labor Day and during low tide between November and February. Visitors would access the shoreline from access paths to Long Point, and from the parking lot at Fisherman's Cove. Visitor activities that would be expected along the shoreline include tide pooling, walking, sitting, and collecting plants and animals.

The resulting impacts due to increased visitor intensity would be a significant and long-term reduction in the value of the intertidal habitat. Intertidal marine resources in southern California are in a steady state of deterioration because of unmanaged or under-managed policies which regulate these areas. However, implementation of the specified Mitigation Measures would reduce impacts associated with visitor use to a less than significant level.

The EIR presented a thorough review of the potential effects of water runoff and pollutants on marine life and presented Mitigation Measures to reduce the effects of any potential effects. Specifically, the implementation of the project's Runoff Management Plan/Water Quality Management Plan, the Stormwater Pollution Prevention Plan,, Water Quality Management Plans and Stormwater Erosion Control Plan would mitigate any potential adverse effects on marine life. In addition, a marine resources monitoring study would be implemented to follow-up and determine if the implementation of these plans are effectively protecting marine resources.

As discussed in Sections 5.3 and 5.8, no significant impacts are anticipated to birds that use the shoreline. Appropriate mitigation has been proposed to avoid significant impacts of noise, traffic, water quality during construction and during the operation of the Resort. There are no populations of breeding seabirds or shorebirds on the shoreline or on the bluffs above the shoreline that would be affected by the Project. Shorebirds and seabirds that visit the shoreline on a seasonal basis below the Point to forage or roost do not spend their entire existence at this site, and will on a regular basis, take flight to other areas of the Palos Verdes shoreline and nearshore waters. This factor, along with the Mitigation Measures proposed to reduce impacts to shorelife would not result in a reduction of biodiversity along the shoreline.

Sea lions and perhaps harbor seals would occasionally use the rocks at Long Point as a haul-out area. These individuals are usually found at the very tip of the Long Point and not in the area where the construction is proposed, nor where the energy dissipater pad is proposed. Little, if any foot-traffic, truck traffic or other construction activities would result in significantly higher dBA levels of noise on the shoreline particularly at Long Point where wave energy itself is likely a source of much higher noise levels than proposed construction noise on the bluffs above the intertidal zone. Lighting from the proposed Project would not be directed towards the shoreline and therefore would not result in a significant impact on either birds or marine mammals. As described in Section 5.8, a marine biologist would be on-site during any shoreline construction where proposed energy dissipaters would be constructed and would have the authority to temporarily halt construction if any marine mammals are within 50 meters of the construction activity that could be disturbed by construction activity.

In addition, refer to Response to Comment Nos. 1T, 18I-16, 227M. Comments are noted and will be considered by the City of Rancho Palos Verdes.

227P. Atmospheric factors affecting noise propagation would include not only wind but also turbulence, temperature/humidity, temperature profile and rain. During times of shore breezes it is acknowledged that noise may travel further, however, minimally. Additionally, the conclusion of the noise analysis does not hinge on the directions of the prevailing winds as the noise survey conducted established only existing conditions. Furthermore, a noise model was run for future with project conditions.

Refer to Response to Comment Nos. 72D and 86B. Comments are noted and will be considered by the City of Rancho Palos Verdes.

227Q. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes. Additionally, refer to Response to Comment No. 138C.

227R. Section 5.10-4, of the Draft EIR, *Public Health and Safety*, provides a detailed discussion on emergency evacuation routes. As stated in this Section, the General Plan indicates two streets located adjacent to the Project area as disaster routes: Palos Verdes Drive South and Hawthorne Boulevard. Modifications to Hawthorne Boulevard are not included as part of the proposed Project. However, Project implementation would involve modifications to Palos Verdes Drive South including the following:

- Access to the resort hotel is proposed via Palos Verdes Drive South at the existing access to the former Marineland project, opposite Crestmont Lane. A 4-lane divided entry is proposed to allow right and left turns onto Palos Verdes Drive South and allow right and left turns into the resort hotel.
- Access to the practice facility is proposed off of Palos Verdes Drive West adjacent to an existing emergency access roadway to the Villa Capri townhouse development.
- Access to the golf maintenance facility is proposed from Palos Verdes Drive South via the alignment of an existing unpaved dirt road.
- One golf cart tunnel crossing is proposed under Palos Verdes Drive South which would connect the RHA with UPVA by a tunnel system under Palos Verdes Drive South.

It is anticipated that traffic flow would be temporarily impacted during construction of these proposed improvements. However, Project compliance with City Development Code 12.04.040, Section 128, would be required. This Section of the Code specifically states the following with respect to street construction:

*“Any-person engaged in performing work regulated by this Chapter which interferes with or endangers the safe movement of traffic shall have the work safeguarded by adequate warning signs, barricades, lights and devices. He shall be responsible for placing and maintaining adequate warning signs, lights, barricades and devices during all periods of his activity in order to promote the safe movement of traffic including but not limited to periods of twilight, fog and/or rain. All warning signs, barriers, barricades, flags, and other devices shall comply with or exceed the standards required in the Vehicle Code. Traffic controls throughout permit construction shall conform to the current State of California "Manual of Warning Signs, Lights and Devices for Use in Performance of Work Upon Highways.”*

Impacts associated with the Emergency Response Plan would be considered as less than significant after compliance with the Development Code.

Further, it should be noted that the proposed Project is limiting development and improvements to the UPVA and RHA. The proposed access improvements are being designed to facilitate adequate traffic movement for peak hour conditions which would also ensure adequate emergency condition vehicular movement from the Hotel site and along the adjacent roadway network. Therefore, it is anticipated that the Project would not have a significant impact relative to the implementation or interference with emergency response/evacuation plans.

According to Attachment 2, Threat Summary 3, *Map of Evacuation Routes*, of the MHFP, there are no areas depicted as evacuation routes in the immediate Project area. Therefore, a significant impact would not occur in this regard. Comments are noted and will be considered by the City of Rancho Palos Verdes.

227S. Refer to Response to comment 77D. Additionally, as noted in Section 5.10, *Public Health and Safety*, implementation of the proposed Project may create a significant hazard to the public and the environment through the disposal of hazardous materials. Several areas of concern were documented during the site inspections on March 2, 1998 and September 6, 2000. These are illustrated on Exhibit 5.10-1, *Areas of Concern*. Additionally, review of available environmental documentation and interviews indicate that previous uses within the Project site may have resulted in potential adverse environmental conditions. Specific uses include military use, some of the former Marineland structures, and the agricultural operations. Impacts associated with the site conditions and the historical use of the Project site are considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of the specified Mitigation Measures.

Comments are noted and will be considered by the City of Rancho Palos Verdes.



227T. CEQA Guidelines Section 15126.6(a) states that “an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” In compliance with this Section of the CEQA Guidelines, Section 7.0, *Alternatives to The Proposed Project*, describes a range of alternatives and evaluates the comparative merits of the alternatives and the proposed Project as identified in Section 3.0, *Project Description*. A residential development would not be reasonable since the RHA is designated *Commercial Recreational* on Figure 16, *Commercial Activity*, of the General Plan Urban Environment Element. Additionally, a residential development would not meet the basic project objectives as identified in Section 3.4, *Project Objectives*. Comments are noted and will be considered by the City of Rancho Palos Verdes.

CEQA Guidelines Section 15126.6(d) states that “the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project. . . . If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” In compliance with this Section of the CEQA Guidelines, Section 7.0, along with the Exhibits contained therein, has provided sufficient information and an adequate level of detail about each alternative to allow meaningful evaluation, analysis and comparison with the proposed Project.

227U. Comments are noted and will be considered by the City of Rancho Palos Verdes.

#### **Response to Comment No. 228**

*William A. Tolliffe, Resident*

March 14, 2001

228A. Refer to Response to Comment Nos. 17E, 24D, 96C and 134C.

228B. Refer to Response to Comment No. 1I.

228C. Refer to Response to Comment Nos. 54J and 201D.

228D. Refer to Response to Comment No. 50B.

228E. Refer to Response to Comment Nos. 54O and 99A. Additionally, it should be noted that the undercrossing’s design would be subject to review and approval as part of the City’s engineering plan review process. As a result, impacts associated with the undercrossing would be considered as less than significant.

As noted in Section 5.11 of the Draft EIR, *Public Services and Utilities*, analysis has concluded that Project implementation would not result in significant impacts to public utilities. The potential impacts are summarized as follows:

Wastewater (Sewer): Project implementation would generate additional wastewater beyond current conditions and would require an incremental expansion of the existing sewerage system. With payment of appropriate connection fees impacts to wastewater systems and facilities would be considered as less than significant. Also, refer to Response to Comment No. 10B.

Water: Project implementation would increase the demand for water beyond current conditions requiring the expansion of existing facilities. Analysis has concluded that a less than significant impact would occur in this regard.

Electric/Gas/Telephone: Project implementation would result in an increase in the demand for electrical, gas, and telephone service beyond existing conditions and would require expansion of the existing systems. Analysis has concluded that impacts would be less than significant.

228F. Refer to Response to Comment Nos. 5D, 134C and 174C.

228G. The following are responses to specific questions referenced in the Appendix to the comment letter:

(1) Of the 168.4 acres on the Project site, only 28.12 acre represent native habitat for wildlife. The mitigation proposed in the Draft EIR would provide for the creation of 16.80 acres of new coastal sage scrub habitat area within the UPVA Conservation Planning Area and Recreation Area. This, combined with the 14.63 acres of existing coastal sage scrub habitat, the 4.44 acres of coastal bluff scrub habitat, and the 3.87 acres of rocky shore/coastal bluff habitat that would be retained, would result in the protection and creation of a total of 39.74 acres of coastal sage scrub, coastal bluff scrub, and rocky shore/coastal bluff habitat.

(2) Wildlife are expected to return to the site immediately after the installation of the mitigation area. However, this use is expected to be limited in the beginning of the establishment program, with potential foraging activities within the native plants and seedlings that are established. It is expected, and documented from other mitigation sites, that these areas will be used in greater frequency as the plant material in this area matures.

(3) Monitoring costs for a qualified restoration ecologist to monitor the restoration process for five years is estimated at \$60,000. This figure can change based on the final restoration program approved by the resource agencies.

228H. Refer to Response to Comment Nos. 54J, 55A and 201D.

The Hydrology and Water Quality Technical Appendix (available at the City Hall) describes the expected relative percentage of impervious area for each land use type (Section 4.1). For the analysis, natural areas were assumed to have 0% impervious, the golf course (includes holes and cart paths) was assumed to have a 10% impervious ratio, the residential areas are expected to have an impervious percentage of 42%, and proposed buildings and parking lots were assumed to have 100% impervious ratio. As described in the Technical Appendix, the watershed is comprised of Altamont Clay Loam (per the LA County Hydrology Manual) which has a high runoff potential. The large slopes (average of over 10% in the natural condition) in combination with the Clay Loam produce a high runoff in the natural condition. Therefore, infiltration rates in areas not covered by impervious areas are expected to be similar to the natural (see comparison of runoff in Section 5.6 of the Draft EIR).

The precise amount of runoff that would be produced from the golf course cannot be quantified since the amount of runoff would be directly correlated to the irrigation practices used by the golf course operator. As stated in the Section 5.6 of the Draft EIR, the golf course would utilize a state-of-the-art irrigation system which is designed to minimize nuisance runoff from the golf course. The irrigation runoff from the golf course would be monitored as part of the proposed Adaptive Management Plan. The Adaptive Management Plan would recommend changes in irrigation practices if nuisance runoff is excessive.

Expected runoff to Rancho Palos Verdes Drive South is listed in Table 5.6-5 in the Draft EIR. The runoff would be conveyed in culverts as approved by the City of Rancho Palos Verdes during the design phase of the Project. Debris basins would be cleaned out by either the City or the Golf Course Operator on a schedule determined by the City.

228I. Refer to Response to Comment Nos. 50B and 78B.

Further, it should be noted that lighting and gating of the tunnel would be required by the City as safety measures. The exact specifications of the lighting and gating would be determined by the City at the design stage of the tunnel.

228J. Refer to Response to Comment Nos. 54O and 99A.

Section 5.11, *Public Services and Utilities*, identifies the locations of the existing utilities.

**Response to Comment No. 229**

*Mike Tom, Resident*

April 6, 2001

229A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 230**

*Shelly Trainor, Resident*

April 1, 2001

230A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 231**

*U8 Angels Girls Softball Team, Residents*

March 28, 2001

231A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 232**

*Jennifer Uhe, Resident*

March 25, 2001

232A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 233**

*Leslie W. Vien, Resident*

April 4, 2001

233A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 234**

*Anita Vitro, Resident*

February 27, 2001

234A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 235**

*Arvid and Sue von Nordenflycht, Residents*

April 1, 2001

235A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 236**

*John & Marlis Wachli, Residents*

March 10, 2001

236A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 237**

*Thomas Edward Wall, Resident*

March 29, 2001

237A. As discussed in Section 5.13, *Recreation*, the Project's proposed trails network would not conflict with the policies and recommendations identified in the General Plan and Coastal Specific Plan, including those with respect to bicycle paths. Analysis has concluded that the Project would be consistent with the recommendations and a less than significant impact would occur.

237B. This commentor accurately notes that the traffic study follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (MTA). The City of Rancho Palos Verdes does not presently have traffic study guidelines of their own, and therefore, use the County of Los Angeles Guidelines. It is not uncommon for Cities, such as the City of Rancho Palos Verdes, to utilize County guidelines. Further, these guidelines are considered adequate for the purpose of conducting traffic studies.

**Response to Comment No. 238**

*Clayton G. Wannamaker, Resident*

April 4, 2001

238A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 239**

*Janet L.B. Watters, Resident*

March 30, 2001

239A These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 240**

*Jakob Wersching, Resident*

March 9, 2001

240A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 241**

*John Wessel, Resident*

April 2, 2001

241A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 242**

*Scott Wildman, Resident*

April 3, 2001

242A. Section 3.0, *Project Description*, describes the proposed Project. A softball field has not been identified as a Project component.

**Response to Comment No. 243**

*Gregg and Jeanne Willard, Residents*

March 28, 2001

243A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 244**

*J. M. Woodcock, Resident*

March 26, 2001

244A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos

**Response to Comment No. 245**

*Otis D Wright, II, Resident*

April 4, 2001

245A. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 246**

*Scotty Wuerker, Resident*

March 10, 2001

246A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 247**

*Scotty Wuerker, Resident*

SOC II Steering Committee

April 5, 2001

247A. Refer to Response to Comment Nos. 11W and 209A.

247B. Refer to Response to Comment No. 1C.

247C. Pursuant to CEQA Guidelines Section 15124(b), the Project Description shall contain "a statement of the objectives sought by the proposed project". Further, "the statement of objectives should include the underlying purpose of the project".

247D. Refer to Response to Comment No. 26C.

247E. Refer to Response to Comment No. 11W.

247F. Table 5.12-14, *Resort Hotel Area Parking Provisions*, details the locations and quantities of the proposed parking.

As discussed in Section 5.12-4, *Parking Capacity*, the parking rate of 1.5 spaces per room inherently includes employee parking.

247G. Refer to Response to Comment No. 200C.

247H. Refer to Response to Comment No. 74A.

247I. The issue of insurance liability is not within the scope of CEQA.

Also, refer to Response to Comment No. 50B.

247J. Refer to Response Nos. 54D and 54K.

Further, it should be noted that Conditional Use Permits do not constitute a Zone Change. The proposed resort/conference hotel, golf course, driving range, and related ancillary uses are legal permitted uses within their respective Districts by conditional use permit.

247K. Refer to Response to Comment No. 115B. Further, a Conditional Use Permit would not permit "noncompliance" as noted in this comment.

247L. Refer to Response to Comment No. 18D.

247M. It should be noted that all of the letters, electronic mails, and comments submitted at public hearings will form a part of the Final EIR and will be considered by the City of Rancho Palo Verdes. Also, Refer to Response to Comment No. 74A.

247N. This comment is noted and will be considered by the City of Rancho Palos Verdes

**Response to Comment No. 248**

*Akemichi Yamada, Resident*

February 26, 2001

248A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.



**Response to Comment No. 249**

*Alice S. Young, Resident*

March 10, 2001

249A. These comments do not raise a new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 250**

*Douglas Young, Resident*

April 1, 2001

250A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 251**

*Jill Zachman, Resident*

March 29, 2001

251A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 252**

*Erika Zambello, Resident*

March 26, 2001

252A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Response to Comment No. 253**

*Elizabeth Zevin, Resident*

March 26, 2001

253A. These comments do not raise any new environmental issue. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**RESPONSE TO  
MARCH 13, 2001  
ORAL PUBLIC HEARING  
COMMENTS**

## ORAL COMMENTS AT CITY OF RANCHO PALOS VERDES PLANNING COMMISSION REGULAR MEETING OF MARCH 13, 2001

### **Comment No. 254**

*Vice Chairman Clark, Planning Commissioner*

254A. *Vice Chairman Clark asked Mr. Lajoie to explain how the consultants derived the alternatives to the proposed Project that were included in the Draft EIR.*

Mr. Lajoie stated that CEQA Guidelines require a “No Project” alternative evaluation with any EIR. Additionally through the process of consultations with City staff and review of the applicant’s development package, including possible design modifications that the developer was considering, the other alternatives were identified and incorporated into the Draft EIR. Through the consultation process of the Notice of Preparation further definition and decisions were made in terms of alternatives to be reviewed. He stated that alternatives in the document were pursuant to CEQA Guidelines.

Additionally, refer to Response to Comment Nos. 13A and 106A.

### **Comment No. 255**

*Vice Chairman Clark, Planning Commissioner*

255A. *Vice Chairman Clark asked about the alternative that included the presumed use of Coast Guard property.*

Deputy Director Snow responded that the City had previously tried to initiate a dialogue with the Coast Guard regarding the property. No answers were forthcoming, however. With respect to the incorporation as an alternative, he explained that there is no requirement for property owner authorization for inclusion as an alternative for environmental analysis and comparative purposes only.

Also, refer to Response to Comment No. 23.

### **Comment No. 256**

*Vice Chairman Clark, Planning Commissioner*

256A. *Vice Chairman Clark asked why an alternative to move city hall was not considered.*

Deputy Director Snow stated he did not know why it was not considered and noted that the City Hall parcel was not part of the Project; but he indicated such an alternative could be added and considered if the Commission directed.

Pursuant to CEQA Guidelines Section 15126.6(f)(2)(A), “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR”. An alternative to move city hall was not considered since would not serve to avoid or substantially lessen any of the significant effects of the Project.

**Comment No. 257**

*Commissioner Vannorsdall*

257A. *Commissioner Vannorsdall asked about the Coast Guard antennas on the property and inquired whether they would be in the way of the proposed Project.*

Deputy Director Snow responded that they are Coast Guard antennas and it was staff's understanding that they were still in use.

Director/Secretary Rojas added that the issue of the antennas was one that the applicant had taken into account, knowing that they may have to design a golf course around the antennas.

Refer to Response to Comment No. 23A.

**Comment No. 258**

*Commissioner Long*

258A. *Commissioner Long stated that the proposed mitigation discussed in the Draft EIR for the effect of cycling paths involved proposing joint use pedestrian and cycling paths along Palos Verdes Drive South. He asked if any consideration had been given to the danger of having such joint use paths in the area, where in all likelihood the bicycles would be traveling at a high speed and pedestrians perhaps should not be on the same path.*

Deputy Director Snow answered that was something that could be looked in and responded to in the Final EIR.

Refer to Response to Comment No. 136Q.

**Comment No. 259**

*Mike Mohler, Project Applicant*

259A. *Mr. Mohler addressed the question of the antennas. He stated that the antennas do not interfere with golf play, as the nearest one would be located behind one tee proposed at the City Hall site.*

Comment is noted.

259B. *Mr. Mohler presented slides of the proposed Project. He explained that prior to the Draft EIR being developed, many discussions with Villa Capri and St. Paul's Lutheran Church had taken place. He noted that there may have been a prior commitment, which Destination Development Corporation had not been aware of, that a driving range would not be installed adjacent to Villa Capri. Therefore, Destination Development Corporation supported Draft EIR alternative No. 5, which located the practice facility on the resort hotel area. Mr. Mohler discussed jurisdictional waters in the biology section of the Draft EIR.*

Refer to Response to Comment No. 1B. Additionally, refer to Comment No. 11 submitted by this commentor.

259C. *Mr. Mohler stated that a wetland delineation had been commissioned, and should wetlands be delineated they will be avoided in the plan.*

Refer to Volume IV, *Revised Biological Resources Section*, for a discussion of the Wet

259D. *Mr. Mohler discussed gnatcatchers on the city hall site and disputed the Draft EIR's discussion on the potential impact on the gnatcatcher.*

The proposed Project contains four known gnatcatchers pairs. The approximate center of each of the surveyed pairs observed territory is shown on the biological resource impact map for the UPVA. All four pairs were located within or immediately adjacent (within 150-feet) to the impact area. These pairs will be by the proposed Project due to habitat loss and indirect effects of the proposed Project.

259E. *Mr. Mohler disputed the discussion and encouraged the writers of the Draft EIR to take a hard look at how additional fragmentation was framed. He felt the Ocean Trails project was an example of a golf course that was living in harmony with open space. He asked how the City assisted the Ocean Trails development with the donation of lands to assist in outside mitigation.*

Refer to Response to Comment No. 1N.

259F. *Commissioner Paulson asked if the maintenance building would also be relocated to Long Point property [as a part of Alternative 7.5].*

*Mr. Mohler did not feel it was necessary to relocate the maintenance building as it would be located in an area that was not affecting Villa Capri or St. Paul's. He added that what would be relocated was the driving range, all of the practice facilities, and the cul-de-sac improvements.*

Refer to Response to Comment No. 1B.

**Comment No. 260**

*Barbara Gleghorn, Resident  
Representing SOC II*

260A. *Ms. Gleghorn presented an alternative concept for the improved care of the open public land, which had previously been presented to the City Council on January 16, 2001. The plan called for the preservation of the open space surrounding the City Hall area, and other features.*

*Commissioner Paulson asked about differences in terminology used in letters and correspondence received by the City. He asked about open space and open space with open access to the public.*

*Ms. Gleghorn stated her vision was that the use concept be turned over to the Recreation and Parks Department and the Planning Department so that maximum public input could be received and a decision be made on the particular points, or any of the points raised by SOC II. She stated that this was the people's park and they needed to have input. However, the first and foremost requirement under the SOC II proposal was to protect the habitat and wildlife, yet with public access integrated.*

*Commissioner Long asked if she or SOC II noted specific areas where the Draft EIR needed to look more closely at the impact that the development would have on the City property.*

*Ms. Gleghorn answered that SOC II was quite concerned over some particulars of the project in the Draft EIR. She stated that many speakers at the meeting tonight would be speaking to specific points in the Draft EIR, and that additional written comments would likely be forthcoming.*

*Vice Chairman Clark asked Ms. Gleghorn if she had any specific comments regarding the alternatives listed in the Draft EIR under Sections 7-8 and 7-9. Ms. Gleghorn responded that she did not have any specific comments at this time.*

Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration.

Additionally, refer to Comment Nos. 102 through 105 submitted by this commentor.

**Comment No. 261**

*Jim Knight, Resident*  
Representing SOC II

261A. *Mr. Knight completed the SOC II presentation with slides showing SOC II's concepts of an extension or enhancement of the Point Vicente Park that would make the area more accessible to the public. He discussed the many benefits to the City that this plan would present.*

*Commissioner Cartwright asked Mr. Knight if he had taken an opportunity to look at the Point Vicente enhancement alternative in the Draft EIR and if he had was he in agreement with the impacts as described.*

*Mr. Knight answered that he had looked at it and did not feel that it flushed out all of the benefits available.*

*Commissioner Cartwright stated that the report characterizes 13 different impacts and asked Mr. Knight if he was in agreement that these were the impacts and did he have any further suggestions for the Draft EIR.*

*Mr. Knight stated that he did have comments but he would wait until his public comment section to address those issues.*

*Commissioner Long was interested as to what SOC II might see as possible areas for active recreation uses.*

*Mr. Knight answered that there is a large level section next to city hall and one to the east that would remain grassy areas for active recreational use.*

*Commissioner Mueller asked how the SOC II proposed trails network compared to that of the Long Point projects plan.*

*Mr. Knight stated that the SOC II proposal only addresses the upper portion of the overall site. He stated that he has not seen in the Long Point proposal any handicap access.*

*Vice Chairman Clark asked Mr. Knight if he was against a general plan change to allow a more formalized active recreation.*

*Mr. Knight stated that the SOC II proposal was not changing any use of the park, only enhancing it.*

*Commissioner Paulson stated that he interpreted Section 7.9 of the Draft EIR to say that if the SOC II alternative were adopted then the entire development would not take place.*

*Rita Garcia of RBF Consulting answered that a combination of alternatives would result, and that further clarification of this possibility will be incorporated into the Final EIR.*

*Commissioner Long stated that he would be interested in seeing the EIR incorporate the impact of losing the active recreation areas or potential active use areas in the upper Point Vicente area.*

Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration.

Refer to Response to Comment No. 1G. Additionally, refer to Comment Nos. 134, 135, and 136 submitted by this commentor.

**Comment No. 262**

*George Gleghorn, Resident*

262A. *Mr. Gleghorn stated that he would address Section 7.2 (the No Project Alternative) of the Draft EIR. He felt that it was a misnomer to call the section “no project alternative”. He reviewed the alternative and felt that the term “more intensive development” used in the alternative required definition. Mr. Gleghorn displayed a table comparing the current proposal and the proposal in Section 7.2. He felt the Draft EIR should be more explicit so that comparisons could be made on each of the environmental impact subjects.*

Refer to Response to Comment Nos. 11W and 106A. Additionally, refer to Comment Nos. 106 and 107 submitted by this commentor.

262B. *Regarding the conclusion in the Draft EIR on air quality, Mr. Gleghorn felt there should be quantitative data to support the conclusion.*

Refer to Response to Comment No. 11W.



262C. *Mr. Gleghorn did not feel there was any basis for the statement in the Draft EIR that the existing entitlements would expose a slightly greater number of people and structures to potential adverse effects relating to geology/soils and asked for backup with quantitative data.*

Refer to Response to Comment No. 11W.

262D. *Mr. Gleghorn discussed traffic and circulation and again asked for quantitative data to backup the conclusions made in the Draft EIR. He felt that the Draft EIR was wrong or contradicted itself in many areas. He felt it was biased toward the development of the project and seriously flawed.*

Refer to Response to Comment Nos. 11W and 216A.

**Comment No. 263**

*Lois Larue, Resident*

263A. *Ms. Larue discussed the previous Long Point approvals and her appeal to the Coastal Commission of the original Long Point project.*

Comment is noted.

**Comment No. 264**

*Paul Payne, Resident*

264A. *Mr. Payne thanked Mr. Mohler for his commitment to remove the driving range from behind the townhomes. He stated that he had additional concerns regarding noise, security, and errant golf balls which he felt the developer could address. He asked that the Planning Commission pay close and particular attention to concerns relating to hydrology, preservation of native habitat, and the use of public land for private development. He stated that the HOA would like to see the plan move forward.*

Refer to Response to Comment Nos. 1B, 1B, 18D, 18I, 50B, 54M, and 54N. Additionally, refer to Comment Nos. 172, 173, 174, and 175 submitted by this commentor.

**Comment No. 265**

*Jim Hathaway, Resident*

265A. *Mr Hathaway objected to the use of city land for a private resort. He questioned how the Draft EIR could mitigate all of the potential problems created by the development.*

Refer to Response to Comment 18D.

Not all of the impacts associated with the proposed Project were anticipated to be reduced to a level of less than significant. As stated in Section 5.2, *Air Quality*, the following air quality impacts would remain significant and unavoidable following mitigation:

- NO<sub>x</sub> and PM<sub>10</sub> fugitive dust emissions from construction activities;
- ROG, CO, PM<sub>10</sub>, NO<sub>x</sub> emissions from project operations;
- Cumulative development would also result in significant and unavoidable impacts to regional air quality levels of ROG, NO<sub>x</sub>, CO and PM<sub>10</sub>.

The increase in the severity of the existing air quality violations would make the proposed development inconsistent with one of the two indicators of consistency. Project implementation would result in a significant unavoidable impact with respect to consistency with the AQMP.

If the City of Rancho Palos Verdes approves the Project, the City shall be required to cite their findings in accordance with Section 15091 of CEQA and prepare a Statement of Overriding Considerations in accordance with Section 15093 of CEQA.

**Comment No. 266**

*Bob Nelson, Resident*

Representing Seabluff HOA

266A. *Mr. Nelson stated that the HOA had unanimously voted to support the project in all ways possible. He felt that benefits in Draft EIR were: 1) an 80% increase in native habitat; 2) Eleven miles of new, accessible trails along currently inaccessible cliffs; 3) The demise of the Marineland parking lot; 4) Significantly cleaner runoff once the area is changed into a golf course; 5) New parks along the ocean side of Palos Verdes Drive; and 6) Beautification of Marineland as well as the back of the city hall area.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 267**

*Vic Quirarte, Resident*

267A. *Mr. Quirarte stated that the majority of residents did not want to see development on the City property. He was concerned with removal of the natural habitat and wildlife. He discussed errant golf balls at the church and Villa Capri area. He stated that screens would be required which would obstruct views. He objected to the statement that 50 percent of the tee times at the golf course would be blocked off for customers of the Long Point Resort. He did not think this was in keeping with public accessibility to the golf course.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility.

Also, refer to Response to Comment Nos. 50B and 187B. Additionally, refer to Comment Nos. 186, 187, 188 and 189 submitted by this commentor.

267B. *Regarding runoff, he stated that chemicals involved in maintaining greens at golf course would be far worse than anything currently involved in the runoff.*

Refer to Response to Comment No. 1T, 11S, and 54J and 228H.

**Comment No. 268**

*Norma Knowles, Resident*

268A. *Ms. Knowles stated that the hotel was something the area has long needed. She did not feel there were enough public golf courses available for the growing demand of golfers. She noted there would be many trails open for joggers and walkers that are currently not available. Ms. Knowles reviewed the Deed of Trust granted by the Federal Government and felt that the development was in accordance with the spirit of the Deed of Trust.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 269**

*Joseph Picarelli, Resident*

269A. *Mr. Picarelli stated that the church council had unanimously voted to support the Point Vicente Park enhancement alternative. He stated that there was a tremendous amount of concern regarding errant golf balls which he did not feel could be satisfactorily mitigated as well as the disruption of Sunday worship services and other church functions.*

Refer to Response to Comment 17F, 50B, 54M, 72D, and 78B. Additionally, refer to the Response to Comment No. 179 submitted by this commentor.

**Comment No. 270**

*Angie Papadakis, Resident*

270A. *Ms. Papadakis felt the environmental impact of the project was that the project would beautify the area. She felt Rancho Palos Verdes needed a hotel. She did not think the hotel and golf area would cause any significant environmental impact, as Marineland had previously occupied the site. She noted the trade off made available in that there would be private land that is presently closed to the public that would be open to the public through trails.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 271**

*Jim Knight, Resident*

271A. *Mr. Knight stated that the Draft EIR bases it's figures, impacts, and mitigation on acreage that includes City owned land that the developer does not own or have control over, or even know if it will be included in the project. He felt the proper scope of the project should be based on private property excluding public lands. He disputed the statement in the Draft EIR which said the project increases the quantity of habitat. He pointed out that quantity has nothing to do with quality. He mentioned concern regarding water quality in natural drainage areas and potential impacts to habitat on upper Point Vicente.*

Refer to Response to Comment Nos. 18D, 18I-9, 18I-15, 25B, 25D, 105B, 134C, 136Q and 201A. Additionally, refer to Comment Nos. 134, 135, and 136 submitted by this commentor.

**Comment No. 272**

*Todd Anderson, Resident*

272A. *Mr. Anderson stated he was speaking on behalf of the Girls Softball League on the Palos Verdes Peninsula. He felt there was a tremendous opportunity to expand the development to include additional softball fields on the lower Point Vicente property. He stated that this was addressed in the Draft EIR Section 7.4 Relocated Practice Facility Alternative - Option "A". He felt this option was consistent and compatible with the City's intent to open and expand the Interpretive Center, as they could have shared parking and restroom facilities. It was also consistent with the intended use as seen by the Coastal Commission and a use with was very much needed on the peninsula.*

Comments are noted and will be considered by the City of Rancho Palos Verdes. Refer to Response to Comment No. 15A. Additionally, refer to Comment Nos. 36 and 37 submitted by this commentor.

**Comment No. 273**

*Rowland Driskell, Resident*

273A. *Mr. Driskell indicated that a petition had circulated among the homeowners at Villa Capri regarding the SOC II proposal and he displayed a chart showing the vast majority of residents who were in favor of the SOC II proposal. He was very concerned with the water issues involved with the golf course project and noted that the golf course would tremendously increase the water use.*

Refer to Response to Comment Nos. 18I-15, 71D, 201D and 228E. Additionally, refer to Comment Nos. 70 through 85 submitted by this commentor.

273B. *Mr. Driskell felt the gnatcatcher habitat would be in danger from errant golf balls. The errant golf balls that may be lost in the coastal sage scrub habitat would not, in and of themselves, pose a threat to the gnatcatcher onsite. However, golfers entering the native habitat areas to retrieve errant golf balls has been identified as an issue on Page 5.3-61. Mitigation to address potential indirect impacts to native habitat types and special status plant and wildlife species by the proposed golf course uses are identified in Mitigation Measures 5.3-2a, 5.3-2c through e, and 5.3-2g. Implementation of these measures would reduce the potential disturbance of the golf course activities to less than significant.*

273C. *Mr. Driskell noted that the tranquility of the surrounding neighbors would be lost due golf activity all day every day.*

Refer to Response to Comment Nos. 54M and 72D. Comments are noted and will be considered by the City of Rancho Palos Verdes.

273D. *Mr. Driskell felt the Draft EIR did not sufficiently address the traffic, noise and air quality issues involved with the proposed Project.*

Refer to Response to Comment Nos. 3A, 26A, 64A, 54M, 72D, 18J, 96B, 112A.

273E. *Mr. Driskell felt the project was not safe for the owners at Villa Capri and questioned who would pay for the broken windows and doors and injuries.*

Refer to Response to Comment No. 50B.

273F. *Mr. Driskell felt the wildlife could not co-exist with the golf course.*

Refer to Response to Comment No. 227A.

273G *Mr. Driskell stated that he would like to see the resort built, but only on private property.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 274**

*Ian MacDonald, Resident*

274A. *Mr. MacDonald stated that he was a member of the Palos Verdes Peninsula Land Conservancy and was in agreement with the Long Point resort as proposed by the developer. He felt the Draft EIR was well thought out and he favored development at the site.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 275**

*Bruce McGowan, Resident*

275A. *Mr. McGowan stated that he was in favor of the development and felt the Draft EIR clearly showed there was a massive increase in the public ability to enjoy both the former Marineland site and the City land.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 276**

*David Tomblin, Resident*

276A. *Mr. Tomblin felt that it would be detrimental to the City if the site were not developed. He felt a joint venture of this magnitude would allow all residents to use the City property. He felt that the EIR should address impacts to recreation which would be avoided by the project, in that there would be positive recreational impacts.*

Impacts to recreation are addressed in Section 5.13, *Recreation*. Additionally, refer to Response to Comment Nos. 5I and 17F. Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 277**

*Dena Friedson, Resident*  
Representing SOC II

277A. *Ms. Friedson stated that she was a member of SOC II. She discussed the proposed grading addressed in the Draft EIR and the types of trucks and number of truck trips required for this amount of grading. She did not think the Draft EIR satisfactorily addressed the Mitigation Measures required for the damage caused by the grading activity including construction noise impacts to sensitive habitats. The transport of soil from one location to another would not be required since the Project proposes that cut and fill be balanced on-site. Refer to Response to Comment Nos. 54O, 217A and 217B. Additionally, refer to Comment Nos. 96 through 100 submitted by this commentor.*

277C. *Ms. Friedson also felt the City should be wary in allowing golf fairways and holes in a geologically questionable location.*

Refer to Response to Comment Nos. 11R and 18I-15.

277D. *Ms. Friedson did not think the Draft EIR sufficiently addressed the netting that would be required to achieve golf safety.*

A Peer Review and Safety Analysis of the proposed golf course design concluded that safety netting was not warranted. Moreover, as noted in Section 3.0, *Project Description*, no netting is proposed for either the golf course or the golf practice facility.

Refer to Response to Comment No. 50B.

277E. *Ms. Friedson felt the World War 2 bunker and Nike site should be preserved for historical protection.*

Refer to Response to Comment Nos. 23A and 23C, 158B.

*277F. Ms. Friedson felt the SOC II proposal was environmentally superior.*

CEQA Guidelines Section 15126.6(e)(2) indicates that if the "No Project" Alternative is the "Environmentally Superior" Alternative, then the EIR shall also identify an environmental superior alternative among the other alternatives. Further, the alternative should have the ability to feasibly attain most of the basic objectives of the project (CEQA Guidelines Section 15126.6(a)).

Also, refer to Response to Comment Nos. 1C and 1D.

**Comment No. 278**

*Joan Carbonel, Resident*

*278A. Ms. Carbonel stated she supported the project and the community access to trails and vistas that do not currently exist.*

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 279**

*Stasys Petravicius, Resident*

*279A. Mr. Petravicius felt the Draft EIR too easily mitigated the problems associated with the project. He felt the major land use change to the upper Point Vicente park could not be mitigated. Therefore, he supported the SOC II proposal, for which mitigation would be not needed.*

Comments are noted and will be considered by the City of Rancho Palos Verdes. Additionally, refer to Response to Comment Nos. 18B, 55C, and 265A.

**Comment No. 280**

*William Tolliffe, Resident*

*280A. Mr. Tolliffe felt the project proposal would result in fragmented habitat. He also commented that the plants and wildlife would be subject to disturbance by errant golf balls, golfers in search of lost golf balls, abnormal water, the use of herbicides and pesticides, and the activities of maintenance crews and machinery.*

Refer to Response to Comment Nos. 1N, 5G, 96C, and 134C. Additionally refer to Comment No. 228 submitted by this commentor.



280B. *Mr. Tolliffe stated that the grading and watering of the golf course would alter the established drainage patterns and affect soil stability. He felt that further analysis of golf course watering, drainage patterns and loss of percolation area was needed.*

Refer to Response to Comment Nos. 54J and 201D.

280C. *Mr. Tolliffe noted that the driving range presented a danger of flying golf balls to residents and churchgoers as well as motorists. He felt that tees should be at least 300 yards from the roadway.*

Refer to Response to Comment Nos. 50B and 78B.

280D. *Mr. Tolliffe felt the proposed tunnel needed further study, as it would create traffic and utility problems during its construction, and could be too steep for golf carts. Refer to Response to Comment Nos. 54O, 99A, 99B and 228E. Additionally, the Grading Plan for Tentative Parcel Map 26073 (October 2, 2000) which illustrates the proposed tunnel (Detail "A") is available for review at the Planning, Building, and Code Enforcement Department at the City Hall.*

**Comment No. 281**

*Barbara Sattler, Resident*

281A. *Ms. Sattler stated that the biological resource section of the Draft EIR referred to several surveys that had been done. She felt the complete detailed reports of the surveys should be available, but are not, in the appendix. She questioned how the surveys were performed. She felt the cumulative affect of multiple developments occurring in Southern California could be devastating to many species of wildlife. She felt that some of the conclusions of less than significant impact in the Draft EIR seemed to be based on mitigation outlined in the LPHCP (Long Point Habitat Conservation Plan), however she noted that the LPHCP had not been presented to the public, was not a part of the EIR, and had not been approved as a habitat protection plan. Therefore, she felt that no satisfactory mitigation should be assumed based on the LPHCP. She opposed using public land for golf, and did not want the zoning changed.*

Refer to Response to Comment Nos. 18D, 200A, 200B, 200C, 54L. Additionally, refer to Comment Nos. 200 and 201 submitted by this commentor.

**Comment No. 282**

*Alfred Sattler, Resident*

282A. *Mr. Sattler stated that he supported the SOC II alternative, and discussed the preservation of wildlife and habitat. He felt the no project alternative (existing entitlements on Long Point) and the SOC II proposal combined should be an alternative.*

Comments are noted and will be considered by the City of Rancho Palos Verdes. Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration. Refer to Response to Comment No. 1G.

**Comment No. 283**

*Lily Van Patten, Resident*

283A. *Ms. Van Patten read a statement from Daphne Clarke who was not able to attend the meeting. Ms. Clark did not feel the upper Point Vicente Park land should be included in the NCCP plan, which she understood was for private property. She supported a plan for the Long Point property that did not include the use of public land for private financial gain.*

Comments are noted and will be considered by the City of Rancho Palos Verdes. Section 7.9 of the Draft EIR, *Point Vicente Park Enhancement Alternative*, provides an analysis of the SOC II Alternative. It should be noted that the SOC-II Alternative is presented for comparison purposes only and no formal proposal is before the City for consideration. Additionally, refer to Response to Comment No. 1G.

**Comment No. 284**

*Barry Holchin, Resident*

Representing the Palos Verdes/South Bay Sierra Club

284A. *Mr. Holchin stated that he was the conservation chair for the Palos Verdes/South Bay Sierra Club. He stated that he supported the Point Vicente Park enhancement alternative as an environmentally superior alternative. He opposed any alternative that proposes development of the public land.*

Refer to Response to Comment No. 1C, 1D, and 18D. Additionally, refer to Comment Nos. 17 and 18 submitted by this commentor.

284B. *Mr. Holchin stated that short term and long term air quality impacts in conflict with the AQMD and RCPG were anticipated with this project.*

Refer to Response to Comment No. 18J, 96B, 112A.

284C. *Mr. Holchin noted indirect impacts on electricity and natural gas consumption from this project were considered significant. He felt that energy conservation should be an integral part of the project design including, but not limited to, design of all structures to use passive solar heating where possible, use of alternative energy sources whenever possible, and use of fluorescent lighting wherever possible.*

Refer to Response to Comment No. 17D.

284D. *Mr. Holchin stated that wildlife movement must not be disrupted with fragmentational barriers and coastal access must be maintained. He asked that a trail committee established for the project that includes representatives from the Sierra Club.*

Refer to Response to Comment Nos. 1I, 1N, 17F.

#### **Comment No. 285**

*Jess Morton, Resident*

Representing the Coastal Conservation Coalition

285A. *Mr. Morton stated that he was speaking for the Coastal Conservation Coalition. He stated that he would submit detailed, written comments of concerns at a later date. He discussed Section 5.3-1. He stated his serious reservations with the section in that there were many misspellings and inconsistent taxonomy. He felt there were many species not included in the analysis or the analysis done was inadequate. He specifically noted the El Segundo Blue Butterfly, which is protected under the Endangered Species Act, and which he believed to be known on the Point Vicente Park property. He did not feel the species was addressed properly in the Draft EIR.*

Refer to Response to Comment No. 1H and 1K. Additionally, refer to Comment No. 5 submitted by this commentor's organization.

285B. *Mr. Morton discussed Section 5.3-2 relating to habitat conservation plan as an alternative to the NCCP. He felt that any implication that a habitat conservation plan could be presented as some sort of active working document is mistaken. He felt it was very unlikely that while the NCCP was being considered any habitat conservation plan would be considered by the U.S. Fish and Wildlife Service or California Fish and Game.*

Refer to Response to Comment No. 200C.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

285C. *Mr. Morton discussed Section 5.3-3 regarding wildlife movement. He felt that the upper Point Vicente area was crucial for the Palos Verdes Peninsula and was not adequately addressed in the NCCP.*

Refer to Response to Comment No. 1I and 1N. Comments are noted and will be considered by the City of Rancho Palos Verdes.

285D. *Mr. Morton concluded by stating that if the Upper Point Vicente Area was included in the Project the cumulative impacts could not be mitigated.*

Refer to Response to Comment Nos. 5A and 39B.

**Comment No. 286**

*Angelika Brinkmann Busi*

Representing the South Coast California Native Plant Society

286A. *Ms. Brinkmann stated she was speaking on behalf of the South Coast California Native Plant Society. She stated this was the first EIR she had reviewed that did not include a list of plants currently found on the site. She noted that the Draft EIR stated that surveys have been done, however the surveys and results were not included in the Draft EIR or appendix. She too noted many misspellings of plant names in the report and many erroneous definitions. She also felt the Draft EIR contradicted itself in many areas and pointed out the definition of "wildlife corridor" and it's use in the report as an example. She stated that a survey of the gnatcatcher had been recently done and was not included or mentioned in the Draft EIR. She thought Dr. Atwood's past studies of gnatcatchers should be referenced, as the upper Point Vicente site has a high fledgling production rate. She felt the proposed habitat design and the NCCP preferred designs were not her preferred designs.*

Refer to Response to Comment Nos. 1H, 1J, 1K and 1N.

The preparers of the Draft EIR are not aware of any recent gnatcatcher surveys that have been conducted on the Project site. Dr. Atwood's studies are discussed on Page 5.3-34 of the Draft EIR. Comments are noted and will be considered by the City of Rancho Palos Verdes.

Additionally, refer to Comment No. 1 submitted by this commentor.

**Comment No. 287**

*Holly Cain, Resident*

287A. *Ms. Cain felt the Draft EIR used “no significant impact” too freely throughout the report and felt impacts should be looked at much more carefully. She supported no golf course development on the upper Point Vicente area and supported the SOC II proposal. She felt that impacts to historical resources, risk of hazardous materials from pesticides and loss of existing pedestrian trails would all be significant.*

Refer to Response to Comment Nos. 1N, 5I, 17F, 23A, 23C, 54H, 55C and 158B. Additionally, refer to Comment Nos. 50 and 51 submitted by this commentor.

As noted in Section 5.10, *Public Health and Safety*, implementation of the proposed Project may create a significant hazard to the public and the environment through the disposal of hazardous materials. Several areas of concern were documented during the site inspections on March 2, 1998 and September 6, 2000. These are illustrated on Exhibit 5.10-1, *Areas of Concern*. Additionally, review of available environmental documentation and interviews indicate that previous uses within the Project site may have resulted in potential adverse environmental conditions. Specific uses include military use, some of the former Marineland structures, and the agricultural operations. Impacts associated with the site conditions and the historical use of the Project site are considered significant unless mitigated. Impacts would be reduced to less than significant levels with implementation of the specified Mitigation Measures.

Comments are noted and will be considered by the City of Rancho Palos Verdes.

**Comment No. 288**

*Robert Haase, Resident*

288A. *Mr. Haase felt the Draft EIR was not sufficiently specific, did not supply quantities, and did not supply facts. He felt that public parkland has long been recognized as being essential for man’s well being, spiritual as well as physical. He did not feel the public land should be given to a private developer for financial gain. He felt the City should not consider the Draft EIR, and that the process was a charade.*

Refer to Response to Comment No. 18D. Comments are noted and will be considered by the City of Rancho Palos Verdes. Additionally, refer to Comment No. 115 submitted by this commentor.

**Comment No. 289**

*Ann Shaw, Resident*

289A. *Ms. Shaw stated she was a member of SOC II. She noted Section 7.1 (the no development alternative). She did not feel proper mitigation was discussed for the two golf holes that were so close to Palos Verdes Drive South (holes 3 and 4) under Alternative 5 supported by the Developer. She felt liability could result from the project as proposed, and that safety issues of the alternative 5 design should be reassessed.*

Refer to Response to Comment No. 50B. Additionally, refer to Comment Nos. 208 and 209 submitted by this commentor.

**Comment No. 290**

*Vice Chairman Clark, Planning Commissioner*

290A. *Vice Chairman Clark stated that in reviewing the traffic analysis in the Draft EIR he did not see any consideration of egress onto 1<sup>st</sup> Street in San Pedro. He felt that should be addressed in the EIR. He further did not feel the alternative for the proposed Project to be built only on Long Point property was sufficiently addressed in the Draft EIR.*

Refer to Response to Comment Nos. 11W and 77E.

**Comment No. 291**

*Commissioner Mueller*

291A. *Commissioner Mueller questioned whether the traffic analysis included employees, delivery vehicles and trips, and other operational impacts, as the term “patrons” seemed limiting.*

Refer to Response to Comment No. 26A.

**Comment No. 292**

*Commissioner Paulson*

292A. *Commissioner Paulson questioned why certain survey data was not included in the Biological sections of the document.*

Refer to Response to Comment No. 200A.

**Comment No. 293**

*Commissioner Cartwright*

293A. *Commissioner Cartwright noted the lack of input from U.S. Fish and Wildlife Service and the California Department of Fish and Game as of this time.*

It should be noted that comments have been received by the U.S. Fish and Wildlife Service and the California Department of Fish and Game, and are included as Comment Letters Nos. 24 and 25.

**RESPONSE TO  
MARCH 26, 2001  
ORAL TRAFFIC  
COMMITTEE MEETING  
COMMENTS**



## **CITY OF RANCHO PALOS VERDES ORAL COMMENTS AT TRAFFIC COMMITTEE ON MARCH 26, 2001**

### **Comment No. 294**

*Rowland Driskell, Resident*

294A. *Passed out handouts to go along with his testimony. Stated that at Hawthorne Blvd. and PVDS, there will be an increase of 51% in traffic making a right turn and a 47% increase in traffic going down hill after project is completed per EIR.*

Handouts referenced in this comment are the same as Comment No. 76. Therefore, refer to Response to Comment Nos. 64A and 76A.

294B. *Feels that the criteria of the report are for more of a compacted high-density area.*

As noted in the traffic study, the analysis follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the latest Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Agency (MTA).

294C. *In addition, the market at Golden Cove Plaza is going to be turned into Montessori School, which will generate 400 students. Left hand turns out of Via Rivera and left hand turns out of Vallon, onto Hawthorne are extremely dangerous and already critical.*

The other development included within the traffic study included those projects that were proposed within the study area at the time the traffic study was prepared.

Section 5.0 of the Draft EIR provides a cumulative impact assessment for each applicable environmental issue, and does so to a degree which reflects each impact's severity and likelihood of occurrence. The cumulative analysis took into consideration the relevant past, present and probable future projects producing related or cumulative impacts (refer to Table 4.1, *Approved and Pending Projects in Rancho Palos Verdes*). The information in Table 4.1 regarding potential other development was obtained from previous traffic studies in the study area and City of Rancho Palos Verdes staff based on the available data at the time the Draft EIR was completed. Further, it should be noted that a more intense grocery store was included in the analysis in lieu of the school proposed at the market.

### **Comment No. 295**

*Dena Friedson, Resident*

295A. *See attached document.*

The document referenced in this comment is the same as Comment No. 99. Therefore, refer to Response to Comment Nos. 99A through 99E.

**Comment No. 296**

*Tom Redfield, Resident*

296A. *Regarding the intersection of PVDE & PVDS, traffic has greatly increased. In future planning please consider a signal at this site. Possibly re-configure PVDS. Feels it is definitely a safety issue.*

As noted in the traffic study, the intersection of Palos Verdes Drive East/Palos Verdes Drive South is projected to operate at Level of Service "B" or better during the peak hours for existing plus ambient growth plus proposed project plus other development traffic conditions.

Additionally, refer to Response to Comment No. 65A.

296B. *The truck traffic is a major concern, during construction in particular.*

Refer to Response to Comment No. 54O.

**Comment No. 297**

*Wendy Force, City of Palos Verdes Estates Public Works Department*

297A. *Has deep concerns regarding anticipated significant traffic problems. Traffic analysis provided in EIR makes incorrect assumptions.*

Refer to Response to Comment Nos. 3A, 4A, and 294B.

297B. *Pages D&F 72 & I&J, in EIR, particularly looking at the intersection of PVDS approaching Hawthorne Boulevard, there is a 6-18 % increase in peak times if you look at figures.*

Comment is noted.

297C. *EIR has no analysis for PVDW & Via Corta. This intersection is way beyond its capacity.*

The traffic study follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (MTA). Based upon the County of Los Angeles traffic study guidelines, the study area should include arterial highways,

freeways, and intersections generally within a one-mile radius of the Project site. The intersection of Palos Verdes Drive West/Via Corta is not listed as a CMP arterial monitoring intersection within the Los Angeles County CMP and is located over 5 miles from the Project site.

Also, refer to Response to Comment No. 3A.

**Comment No. 298**

*William Tolliffe, Resident*

298A. *Concerned because some of the golf holes are parallel to PVDS. Golf balls ending up in traffic lanes is a concern.*

Refer to Response to Comment No. 50B.

298B. *With regards to the tunnel, he would like more information, i.e. how long, how wide, where?*

Refer to Response to Comment Nos. 54O, 99A, 99B, and 228E. Additionally, the Grading Plan for Tentative Parcel Map 26073 (October 2, 2000) which illustrates the proposed tunnel (Detail "A") is available for review at the Planning, Building, and Code Enforcement Department at the City Hall.

**Comment No. 299**

*Ann Shaw, Resident*

299A. *In favor of Resort on Long Point [only], however we need to take a closer look at the angle of Hole No. 2 of the Golf Course. Balls are being shot onto PVDS.*

Refer to Response to Comment No. 50B.

**Comment No. 300**

*Action Taken*

300A. *PVDE at PVDS: Potential area for traffic signal with shared costs. Comes down at a right angle per Member Hildebrand. Member Schurmer, careful consideration should be given to PVDE Plan. No conduit going in at this intersection at this time per Dean Allison. Is a backbone system to be installed initially? Chair Jones: What is the maximum [number of] signals that could be installed on PVDS? Per Dean Allison probably 2 at this time.*

Refer to Response to Comment No. 296A.

**Comment No. 301**

*Committee Member Covey*

301A. *In favor of having resort at Long Point. Knows it will generate traffic, however how much traffic did Marineland generate over a weekend? She thinks that a proper exit can be designed. Also, correct the direction of golf holes so golf balls do not go outside of golf range.*

Trip generation represents the amount of traffic which is produced or attracted to a development. The traffic generation for this project has been estimated, based upon the specific land uses which have been planned for the proposed development. The trip generation rates within the traffic study are based upon the latest data collected by the Institute of Transportation (ITE) and San Diego Association of Governments (SANDAG). The rates include all of the trips related to each specific land use.

Additionally, pursuant to CEQA Guidelines Section 15126.6, Section 7.0, *Alternatives to The Proposed Project*, evaluates the comparative merits of the Alternatives and the proposed Project as identified in Section 3.0, *Project Description*. Therefore, a comparative analysis of Alternative 7.2 and Marineland is not required under CEQA.

Refer to Response to Comment No. 50B.

**Comment No. 302**

*Committee Member Paula Reuben*

302A. *Pg. 21 section 15 & 16, the level of service calculations were made at A.M. peak hours May, July and August of 1999. Regarding the corner of Silver Spur & Hawthorne Boulevard, Peninsula High School was not in session 2 out of 3 of those months. Weekend traffic is also busy at this intersection. A lot more traffic than EIR is showing.*

Adjacent to the Peninsula High School, the traffic study recommends the addition of a southbound right turn lane at the intersection of Silver Spur Road/Hawthorne Boulevard. This lane may require the restriction of parking at the north leg of the intersection. Students may have to park further north along Silver Spur Road with the provision of increased capacity at the Silver Spur Road/Hawthorne Boulevard intersection. Removal of parking will provide for increased visibility on the north leg of the Silver Spur Road/Hawthorne Boulevard intersection for pedestrians. Restriction of on-street parking in the vicinity of schools is generally considered as a safety improvement.

302B. *See Attachment. See Pg. 13 re-striping Silver Spur Road. Hard to reconcile with existing format on Pg. 18 unless Student crossing is eliminated on both sides of Silver Spur Road. Students can not park on Hawthorne Boulevard neighborhood streets or shopping center. The only way to re-stripe the road is to eliminate all parking on these streets. What can be done?*

The attachment referenced in this comment is the same as Comment No. 194. Therefore, refer to Response to Comment Nos. 54O, 26A, 194, and 302A.

**Comment No. 303**

*Committee Member Hildebrand*

303A. *Regarding Silver Spur & Hawthorne Boulevard. He reviewed EIR for Avenue of the Peninsula. As he recalled, A.M. condition at Silver Spur Road & Hawthorne Boulevard was very bad. Afternoon dispersal is spread out over a couple of hour period. Is there room for re-striping? Can left turn be extended further south? Then you take away another turn in to the parking center. Cannot do the mitigation because the width of street does not allow enough space.*

Member Reuben: That particular intersection is shared by two cities.

Refer to Response to Comment No. 302A.

**Comment No. 304**

*Committee Member Covey*

304A. *Refer back to George Gleghorn's letter Pg. 2, present proposal has 400 residents in hotel. 390 + 10 the alternate is #7:14 pg. 7-9 in EIR (Monaghan Proposal) done back in 1989 and EIR was adopted which is our understanding that is [extended] every year since and is still in effect. Present plan says there will 6,263 daily trips, Monaghan 9,619 daily trips, difference is 3,512. This is as a major discrepancy. Why does the Monaghan report say 3,512. Finds no reason for that with exception of new 5.12 package, Pages 11 & 12 tells us where the 6263 total came from. Says hotel will have x number in and out etc.*

*Project trip generation has been adjusted, does not count patron or employees because they are already on site. Where did the 3,500 difference come from?*

*In Member Covey's letter where she suggested a traffic light at PVDS & PVDE. Pg. 31, says that 45% of traffic that goes from Long Point to San Pedro will go past PVDS & PVDE intersection. Monaghan plan still appears to contain an enormous number of cars. Pg. 80 tells the 3 intersections they have chosen to provide mitigating actions, on Pages 8,9,10, 11 they were identified as being a problem.*

*E&F are the worst case. E&F were read by Member Reuben (Existing and Ambient Growth) are Silver Spur & Hawthorne, Silver Spur & Sepulveda, Hawthorne & Pacific Coast Highway & Hawthorne & PVDN. Also, Western & PVDN. She feels that Western at 25<sup>th</sup> street was included because possibly a mistake was made by confusion with Western & PVDN. Should have been traffic count at 1<sup>st</sup> & Gaffey. Hawthorne is the most direct route to Long Point.*

Refer to Response to Comment Nos. 106B, 216A, 296A and 301A.

Based on marketing information provided by the project team, the project trip generation assumes that a percentage of patrons staying at the hotel will use the other facilities on-site. The project trip generation has been adjusted to account for only new trips associated with the project. This internal use does not constitute a new project trip as the patron is already on-site. The project trip generation assumes that for the retail facilities and restaurants approximately 60% is dedicated to internal use and 40% to outside community use. For the health spa/fitness center use approximately 70% internal use and 30% outside community use has been assumed. For the golf course and driving range uses, an assumption of 55% internal use and 45% outside community use has been used within the traffic study.

As noted in the traffic study, the proposed development is projected to generate approximately 6,263 trip-ends per day with 313 vehicles per hour during the AM peak hour and 499 vehicles per hour during the PM peak hour. Without the internal capture assumptions above, the proposed development is project to generate approximately 10,455 trip-ends per day with 500 vehicles per hour during the AM peak hour and 887 vehicles per hour during the PM peak hour.

The traffic study follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (MTA). Based upon the County of Los Angeles traffic study guidelines, the study area should include arterial highways, freeways, and intersections generally within a one-mile radius of the Project site. 1st Street is located at least 5 miles from the Project site. In addition, the intersection of Western Avenue/1st Street is not listed as a CMP arterial monitoring intersection within the Los Angeles County CMP.

**Comment No. 305**

*Committee Member Schurmer*

305A. *Regarding Hawthorne Boulevard, with increase at all levels, then looking at Crest & Crenshaw. What formula is used to move traffic volumes to Crenshaw?*

*Dave Snow/City Planner: Formula: Description on bottom of Pg. 27 to top of Pg. 30 Explains formula. Existing traffic at Hawthorne (Pg. 20). Pg. 11. trip generation pg. 29, table 3 & footnote. 8 uses for site from ITE manual. Nationwide used manual. What type of traffic is generated by a "Resort Hotel"? Destination includes combined trips since all businesses are at same place. Not double counting for each use.*

Trip distribution represents the directional orientation of traffic to and from the Project site. Trip distribution is heavily influenced by the geographical location of the site, the location of residential, commercial and recreational opportunities and the proximity to the regional freeway system. The directional orientation of traffic was determined by evaluating existing land uses and highways within the community and existing traffic volumes. It should also be noted that the resort hotel will provide directional assistance within promotional material that would affect patrons driving patterns for visiting the Project site.

**Comment No. 306**

*Committee Member Wall*

306A. *Why wouldn't we see more traffic on the freeway if people are staying at the resort all day.*

As noted in Section 5.12, *Traffic and Circulation*, the Congestion Management Plan (CMP) for Los Angeles County requires that the traffic impact of individual development projects of potential regional significance be analyzed. The project will not add 150 or more trips, in either direction, during either the AM or PM peak hours along the I-110 Freeway and, therefore, no CMP analysis is required.

**Comment No. 307**

*Committee Member Covey*

307A. *Regarding Pg. 31, percentage of traffic coming south on Harbor Freeway to Gaffey Street. Employees living in area. Trips interacting in area. How many employees do you expect to have : No number in traffic study. Ratio of employees to rooms, plus 3 shifts.*

*Member Schurmer: Potential carpooling or mass transit for employees? Has that been addressed in any way?*

The traffic study project trip generation is not based on employees. The hotel/meeting facility, casitas units and resort villas are based on rooms. The retail facilities, restaurants and health spa/fitness center are based on thousand square feet. The golf course is based on the number of holes provided and the driving range is based on acreage.

The traffic reducing potential of public transit has not been considered in the traffic study. Essentially, the traffic projections are “conservative” in that public transit has the potential to reduce the traffic volumes.

Also, refer to Response to Comment No. 26A.

**Comment No. 308**

*Committee Member Hildebrand*

308A. *Hawthorne Blvd. is a major problem. At PVDN, only place in LA County that has run away car lanes.*

*Long Point tunnel causes him much consternation. Not a traffic issue unless it collapses. There will be acts of vandalism. City will own the tunnel when the project is completed. If we could have 100% maintenance on tunnel, this should cut down on some of the vandalism.*

*Director Allison: Yet to be determined who would maintain.*

As noted in Section 5.12, *Traffic and Circulation*, the Project itself is expected to have a significant traffic impact at the intersection of Hawthorne Boulevard/Palos Verdes Drive North. Implementation of the mitigation specified in the Traffic Impact Analysis would result in no remaining significant impacts.

Also, refer to Response to Comment Nos. 54O, 99A, 99B, and 228E.

**Comment No. 309**

*Committee Member Hildebrand*

309A. *Significant disruption in traffic while being rebuilt. Could have future trouble with tunnel collapsing. Looks like approximately 250 ft. long.*

*Also, an awful lot of parking spaces . 200 square feet per car. 6 acres of property. 1,300 parking spaces. Why so many for hotel with only 200 rooms.*



Refer to Response to Comment Nos. 54O, 99A, 99B, and 228E.

The proposed hotel would include as many as 550 accommodation rooms and 32 villas. Also, refer to Response to Comment Nos. 26C, 26H, 26I, 26J, 26K and 26M.

**Comment No. 310**

*Committee Member Hildebrand*

310A. *When Marineland opened, it had a lot of traffic. At Forrestal, on weekends, it was hard to get across. Are there plans for a light there? Significant that we take a look at numbers, traffic counts when Marineland was open.*

The traffic study follows the County of Los Angeles traffic study guidelines and is intended to be consistent with traffic impact analysis guidelines set forth in the Congestion Management Program (CMP) prepared by the Los Angeles County Metropolitan Transportation Authority (MTA). Additionally, refer to Response to Comment No. 301A.

**Comment No. 311**

*Michael Mohler, Applicant*

311A. *Will investigate hole angles at Golf Course. Will take a look at the intersection of Silver Spur & Hawthorne. Will investigate the 6263 number of daily trips from hotel, seems to be concern over decrease in numbers. Will investigate installing a signal at PVDS & PVDE (per EIR ). Any mass transit for employees of resort? Why there will be 1,300 parking spaces designated to resort?*

Refer to Response to Comment Nos. 296A, 302A, 304A, 307A and 309A.

**Comment No. 312**

*George Gleghorn, Resident*

312A. *Mr. Gleghorn asked for inclusion of 4 Page document. Regarding Section 7.2 of the Draft EIR, Traffic & Circulation, there seems to be conflicting data gathered from two different Firms with 50% difference in numbers.*

The document noted in this comment is included as Comment No. 106. Therefore, refer to Response to Comment No. 106B.

**RESPONSE TO  
COMMENTS RECEIVED  
AFTER CLOSE OF  
PUBLIC REVIEW PERIOD**

## COMMENTS RECEIVED AFTER CLOSE OF PUBLIC REVIEW PERIOD

### **Comment No. 313**

*John J. Reynolds, Regional Director, Pacific West Region*  
U.S. Department of the Interior, National Park Service  
April 9, 2001

313A. Refer to the *Responses to Public Agencies* Section of this document.

### **Response to Comment No. 314**

*Peter Akhotnikoff, General Superintendent*  
California Water Service Company  
April 13, 2001

314A. Refer to the *Responses to Public Agencies* Section of this document.

### **Response to Comment No. 315**

*Steve Smith, Ph.D., Program Supervisor*  
South Coast Air Quality Management District  
April 20, 2001

315A. Refer to the *Responses to Public Agencies* Section of this document.

### **Response to Comment No. 316**

*Danny Kolker, Planning Analyst*  
County of Los Angeles Fire Department  
May 10, 2001

316A. Refer to the *Responses to Public Agencies* Section of this document.